



# INVEZZA POSH POLICY

## (PREVENTION OF SEXUAL HARASSMENT POLICY)

### CONTENTS:

S.No	Content	Page no
1	Objective, Scope & Definition	2
2	Process	3
3	Internal Complaint Committee	4
4	Grievance Procedure	5
5	Procedure for Enquiry	6
6	General Instructions	7
7	FAQs	8



# INVEZZA POSH POLICY

(PREVENTION OF SEXUAL HARASSMENT POLICY)

## 1. Objective:

Invezza Technologies is committed to providing a work environment free from harassment of any kind and in particular, a work environment that has zero tolerance for sexual harassment. We respect the dignity of everyone involved in our workplace, whether team members, clients, vendors, and any other external parties as well. We require all team members to make sure that they maintain mutual respect, dignity, and positive regard toward one another.

## 2. Scope:

This policy extends to all Invezza team members engaged directly and through external third parties, business associates, suppliers, vendors, customers visitors, and any other related party.

This Policy shall deal with all allegations/complaint(s) of Sexual Harassment made by a team member (s) against a team member(s), irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises or against employees engaged through the third party, business associates, suppliers, vendors, customers visitors, and any other related party.

## 3. Definitions:

### 3.1. Sexual Harassment –

- a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- b) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults, or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- c) Any other unwelcome physical, verbal, or non-verbal gesture or conduct of sexual nature, inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.
- e) The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment, as defined in (a) above, may amount to sexual harassment: —
  - (i) Implied or explicit promise of preferential treatment at work; or



# INVEZZA POSH POLICY

## (PREVENTION OF SEXUAL HARASSMENT POLICY)

- (ii) Implied or explicit threat of detrimental treatment at work; or
- (iii) Implied or explicit threat about the present or future employment status; or
- (iv) Interference with work or creation of an intimidating or offensive work environment; or
- (v) Humiliating treatment is likely to affect health, safety, or self-esteem.

### **3.2 Virtual Sexual Harassment –**

In our hybrid working environment, in touch via smartphones or web callings, etc. With this change in the work environment, it is essential that the employees and managers carry the professional code under POSH during all such virtual interactions as well. A few of the guidelines on virtual interaction are as below: -

#### **Do's:**

1. Proper Attire- Employees attending video conferences must be dressed appropriately. Clothing such as vests, undergarments, T-Shirts with suggestive phrases, etc. to be avoided.
2. Content of Conversation - Keep the conversation specific to work areas, projects, and deliverables.

#### **Don'ts:**

1. Background of the video call should be suitable. No poster with provocative content or any other inappropriate element should be visible during the video call.
2. No inappropriate jokes should be made.
3. Late-night video calls to be avoided. If it is a business emergency, then the employee can attend it on “audio-only mode.”

### **4. Process:**

**Internal Complaints Committee (ICC)** - Members of the Internal Complaint Committee The Internal Complaint Committee shall comprise as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the ICC shall comprise the following:

- I. One Presiding Officer who shall be a senior-level woman employee of the Company.
- II. Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge.



# INVEZZA POSH POLICY

## (PREVENTION OF SEXUAL HARASSMENT POLICY)

- III. One outside member from amongst non-Government organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment, whose fee shall be fixed by the management and revised from time to time.

The ICC shall under the authorization of the board of directors or committee responsible for formulation and administration of policies for the organization or any other Senior officer or Director/ CEO nominated by the board or committee, have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company/ establishments.

The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

To remain more accessible and substantially compliant with the law while dealing with the issues of sexual harassment of employees at the workplace, the management has decided to restructure the Internal Committees to make it more region-specific, as under:

**Internal Complaint Committee** (Core Committee) shall consist of the following committee members:

<b>Members:</b> Member Name	Designation	Contact No. & Email ID
Sheetal Patil	Web Developer	sheetal.patil@invezzatechnologies.com 9921556840
Jayshree Kudale	Technical Project Manager	jayshree.kudale @invezzatechnologies.com 9763549130
Nitin Ahire	Technical Lead	nitin.ahire @invezzatechnologies.com; 9822397680
Isha Pathak	Senior Executive (Human Resources)	isha.pathak@invezzatechnologies.com; 8956190417



# INVEZZA POSH POLICY

## (PREVENTION OF SEXUAL HARASSMENT POLICY)

### Grievance Procedure

- a) Any Employee ("Complainant") may lodge a complaint of Sexual Harassment ("Complaint") against an ("Accused") who could be any employee or anyone else upon whom this policy is applicable, with any of the members of the Panel within 30 days from the date of occurrence of the alleged incident. The complaint can be made at the email ID – posh@invezzatechnologies.com
- b) If the Complainant feels that she /he cannot disclose her/his identity for any reason to the Panel members, she/he can address the complaint to the CEO of the Company or management.
- c) Such a Complaint shall necessarily be in writing.
- d) The Complainant shall sign at the foot of each page of the Complaint.
- e) The Complaints Committee will hold a meeting with the Complainant within a period of 15 (fifteen) days of the receipt of the complaint and advance intimation in writing will be given to the Complainant of the same.
- f) At the first meeting of the Complaints Committee, the Complainant shall be heard, and her/ his statement recorded (Statement of Allegation). The Complainant can produce corroborative material with a documentary oral material to substantiate his / her complaint/ allegations.
- g) Thereafter, the Accused will be called by the Complaints Committee and will be informed of the Complaint and an opportunity will be given to the Accused to give an explanation, whereafter, an "Enquiry" shall be conducted.
- h) However, in the event the complaint does not fall under the purview of Sexual Harassment or the Complaint on the face of it does not disclose an element or offense of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof and shall subsequently communicate the same to the Complainant, in writing.
- i) In case the complaint made by the complainant is found to be false and malafide at any stage, it shall amount to misconduct and the complainant shall be liable for appropriate disciplinary action as per the Service Rules.

### Procedure for Enquiry



# INVEZZA POSH POLICY

## (PREVENTION OF SEXUAL HARASSMENT POLICY)

- a) The Complaint's Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and the Accused in writing. The Complaints Committee shall record all the proceedings of the Enquiry and all parties present at any of the communication meetings shall endorse the same in token of authenticity thereof.
- b) The Complaints Committee shall hand over the Statement of Allegation to the Accused and give an opportunity to the Accused to submit a written explanation if she/ he so desires within 15 days of receipt of the same.
- c) The Complainant will be provided with a copy of the written explanation submitted by the Accused.
- d) If the Complainant or the Accused desire any witness/es to be called, they shall communicate in writing to the Complaints Committee the names of witness/es whom they propose to be called.
- e) If the Complainant desires to tender any documents by way of evidence before the Complaints Committee, she/he shall supply true copies of such documents to the Complaints Committee. Similarly, if the Accused desires to tender any documents in evidence before the Complaints Committee he / she shall supply true copies of such documents to the Complaints Committee and will affix his / her signature on the same to certify it to be a true copy.
- f) If the Complainant or the Accused desire any witness/es to be called, they shall communicate in writing to the Complaints Committee the names of the witness/es whom they propose to be called.
- g) If the Complainant desires to tender any documents by way of evidence before the Complaints Committee, she/he shall supply true copies of such documents to the Complaints Committee. Similarly, if the Accused desires to tender any documents in evidence before the Complaints Committee he/she shall supply true copies of such documents to the Complaints Committee and will affix his / her signature on the same to certify it to be a true copy.
- h) The Committee will call upon all witnesses mentioned by both parties.
  - i) The Complaints Committee will provide every reasonable opportunity to the Complainant and the Accused, for putting forward and defending their respective cases.
  - j) The Internal Complaints Committee shall complete the "Enquiry" as soon as possible and communicate its findings to the Management preferably within ten days from



# INVEZZA POSH POLICY

## (PREVENTION OF SEXUAL HARASSMENT POLICY)

the date of completion of the inquiry and such report be made available to the concerned parties.

- k) Where the Internal Complaints Committee concludes that the allegation against the accused/respondent has been proved, it shall recommend to the Management
  - l) The management or anyone nominated by the management shall take appropriate action by the applicable provisions of law while keeping in view the principles of Natural Justice and equity.
- m) The Complaints Committee shall be governed by the provisions of the Prevention of Sexual Harassment at work (prevention, prohibition, and redressal) Act and the rules made thereunder, besides Service Rules & Regulations, while considering the best practices from India and Abroad.

### **5. Confidentiality:**

The contents of the complaint, the identity, and addresses of the aggrieved staff member, respondent, and witnesses, any information relating to conciliation and inquiry proceedings, findings of the Internal Committee, and the action taken by the management of Invezza shall not be published, communicated, or made known to the public, press, and media in any manner. All complaints/grievances of sexual harassment will be taken seriously, will be held in strict confidence, and will be investigated promptly in an impartial manner. For completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

### **GENERAL INSTRUCTIONS**

#### **Protection against Victimization**

The Company is duty bound to take appropriate steps to prevent sexual harassment. The victim of Sexual Harassment has the option to seek transfer of the perpetrator or his / her transfer from one department/branch/station to another.

#### **The obligation of the Management**

The Management of the Company shall provide all necessary assistance to ensure the effective implementation of this policy.

#### **Third-Party Harassment**

Where sexual harassment occurs because of an act or omission by any third party or an outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

#### **Annual Report**

The Internal Complaint Committee shall prepare in such form and at such time as may be prescribed an Annual report at the end of each Calendar/financial year of the Company,



# INVEZZA POSH POLICY

## (PREVENTION OF SEXUAL HARASSMENT POLICY)

giving a full account of its activities during the previous year and forward a copy thereof, to the Management or the person/committee nominated and forward the consolidated report as mandated under the Act to the concerned Authorities.

### Frequently Asked Questions (FAQs)

#### **1) What is sexual harassment?**

Sexual harassment is defined as any unwanted physical, verbal, or visual sexual advances, requests for sexual favors, and other sexually oriented conduct, which is offensive or objectionable to the recipient.

#### **2) When is conduct unwelcome or harassing?**

Unwelcome sexual advances (either verbal or physical), requests for favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when: Submission to such conduct is either an explicit or implicit act.

The conduct having sexual overtones has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

#### **3) What is not sexual harassment?**

Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It only refers to behavior that is not welcome, that is personally offensive, that debilitates morale, and that, therefore, interferes with the morals and values at work.

#### **4) What should one do if harassed sexually?**

If anyone feels that she has been the recipient of sexually harassing behavior, report it immediately to the supervisor and the respective HR Manager. It is preferable to make a complaint in writing at the email id: posh@invezzatechnologies.com, but one can accompany or follow up the written complaint with a verbal complaint.

If the supervisor is the source of the harassing conduct, report the behavior to the next level or as mentioned in the sexual harassment policy.

The identity will be protected, and one will not be retaliated against for making a complaint.

#### **5) What happens after a complaint is made?**

The ICC will investigate the complaint. The committee will first speak to the person who has made the complaint and then will speak to the person named in the complaint. The anonymity of the involved parties will be maintained.