

LTC-Hack Limited

## **POSH**

*Effective Date: Thursday, July 24, 2025*

### Prevention of Sexual Harassment (POSH) Policy

#### 1. Purpose

The purpose of this policy is to foster a safe, respectful, and inclusive workplace for all employees, contractors, and visitors at LTC-Hack Limited. The policy establishes clear definitions, responsibilities, and mechanisms for the prevention and redressal of sexual harassment.

#### 2. Scope

This policy applies to all LTC-Hack Limited employees, contractors, interns, consultants, vendors, and any third party interacting with staff at company premises or on work-related assignments.

#### 3. Policy Statement

LTC-Hack Limited has zero tolerance towards sexual harassment and is committed to taking all necessary steps to prevent, prohibit, and redress such acts.

#### 4. Definition

**Sexual Harassment** includes—

- Unwelcome physical contact or advances
- Demand or request for sexual favors
- Sexually colored remarks, jokes, or gestures
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

#### 5. Internal Committee (IC)

- IC consists of **minimum 4 members**, with at least **50% women**.
- Presided by a senior woman employee as Chairperson.
- Committee includes one external member with POSH/legal expertise.

#### 6. Redressal Mechanism

- Complaints must be submitted **in writing** within **3 months** of the incident.
- IC to acknowledge complaint within **3 working days**.

- Inquiry to be completed within **90 days** of receipt.
- Report to be submitted to management within **10 days** of completion.
- Management to take action within **60 days** of the IC report.

#### 7. Procedure

- Complaint can be made in writing to IC ([posh@ltc-hack.com](mailto:posh@ltc-hack.com)) or in person.
- Both parties are heard and can present evidence/witnesses.
- Confidentiality is maintained throughout.

#### 8. Protection Against Retaliation

No employee will face retaliation for reporting an incident in good faith.

#### 9. Disciplinary Action

If a complaint is substantiated, disciplinary action may include:

- Written apology
- Warning
- Transfer
- Reduction of pay
- Suspension
- Termination

#### 10. Awareness

- Annual POSH training mandatory for **100% employees**.
- Posters with POSH policy summary displayed on every floor.
- Policy forms part of new-hire onboarding pack.

#### 11. Record Keeping

- All IC records retained for a minimum of **5 years**.
- Summary of cases annually submitted to District Officer as per law.

#### 12. Statutory Compliance

Policy adheres to “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013”.