



NOFILTR SOCIAL LLP

POSH (Prevention of Sexual Harassment at Work)

1. PURPOSE:

To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees. As per the guidelines of “The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013,

2. SCOPE:

Nofiltr Social LLP aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in Nofiltr Social LLP towards any other person being an employee of Nofiltr Social LLP, Client, Vendor and Contractor in Company premises or elsewhere in India or abroad.

3. APPLICABILITY:

All employees of Nofiltr Social LLP at all locations.

4. DEFINITION:

1. Employee of Nofiltr Social LLP– Includes person carrying out any work on behalf of Nofiltr Social LLP and may have been hired as Permanent, Temporary, Contracted or on Retainer ship Basis, part-time, contractor, vendor basis etc. either directly or indirectly or through vendor organization.
2. Sexual Harassment – Harassment of a Female/Male employee consisting of any unwelcome sexually determined behavior, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co- employee to harass him/her in manner which prevents or impairs his/her full utilization of

NOFILTR SOCIAL LLP

1404, 14th Floor, Lodha Supremus, Dr. E Moses Road, Worli, Mumbai - 400018.

✉ info@nofiltr.social

🌐 www.nofiltr.social



full benefits, facilities or opportunities or any other behavior which is generally considered to be derogatory .

3. Aggrieved Women / Man- In relation to workplace, a woman/man of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
4. Respondent: Employees against whom the complaint has been filed.

References- Code of Conduct Policy

5. POLICY GUIDELINES:

Sexual Harassment shall include but not limit to: -

- Physical Contact & Sexual advances
- Demand or request for sexual favors;
- Sexually- colored remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

6. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:

A complaint shall be submitted in writing to hr@nofiltr.social or to any member of the Internal Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

7. INTERNAL COMMITTEE:

- a. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal committee consisting of:
 - I. Presiding Officer: VP-HR
 - II. Member - Head of Department
 - III. Lady Member (From NGO or Psychologist or lawyer)
- b. Within 3 working days, the Internal committee shall commence Official Internal Enquiry by:
 - I. By informing the said complaint to the respondent.

NOFILTR SOCIAL LLP

1404, 14th Floor, Lodha Supremus, Dr. E Moses Road, Worli, Mumbai - 400018.

✉ info@nofiltr.social

🌐 www.nofiltr.social



II. By instructing to stop the alleged act of Sexual Harassment immediately

III. By informing not to reach out to the complainant directly or indirectly

IV. By asking an immediate explanation from him/her to the same

c. Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by HIL in order to stop the alleged act(s)

d. Within 15 days from receipt of the original complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counseling sessions with persons involved in alleged act(s)

e. A complaint will be closed no later than one month from receipt of original complaint by recording the decisions of the internal committee, accordingly informing to the complainant and the Respondent of the same.

f. Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.

g. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

NOFILTR SOCIAL LLP

1404, 14th Floor, Lodha Supremus, Dr. E Moses Road, Worli, Mumbai - 400018.

✉ info@nofiltr.social

🌐 www.nofiltr.social



8. REDRESSAL:

- 8.1 An amicable resolution of the complaint is possible only when the written consent of the complainant. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Managing Director.
- 8.2 In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc. and the impact of the offence on the company profile as a whole.
- 8.3 The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.
- 8.4 The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,
- Warning
 - Written apology from offender,
 - Bond of good behavior
 - Transfer
 - Debarring from supervisory duties
 - Denial of employee benefits like increments/promotion/salary correction etc.
 - Cancellation of specific work Assignment
 - Suspension
 - Dismissal

Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.

This policy applies to all employees and associates of Nofiltr Social LLP.

NOFILTR SOCIAL LLP

1404, 14th Floor, Lodha Supremus, Dr. E Moses Road, Worli, Mumbai - 400018.

✉ info@nofiltr.social

🌐 www.nofiltr.social



1. The Company does not support idea of favoritism, Office Romance or Dating.
2. In case such relationships are developed within the group, proof should be submitted to support the information. Gossips impede productivity and damage careers. We as a company encourage transparency.
3. In case it is found that a relationship is developed amongst the employees; It should be immediately brought to the notice of HR.
4. The Company understands and respects the work relationships and objects to sexual harassment at work. Strict action will be taken against such complaints.
5. In case of work place relationships are confirmed, one of them will be transferred to other location or will be asked to resign from the services.
6. Any complaint from our client or supplier regarding Sexual Harassment will be attended on priority and handled on immediate basis.

Acknowledge Name:

Date: