

Prevention of Sexual Harassment at Workplace (POSH) Policy - India

Our Commitment

At E Tech Group, we are committed to providing a workplace where every employee feels safe, respected, and able to contribute fully. Sexual harassment in any form is strictly prohibited and will not be tolerated.

This policy is issued in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and its accompanying rules. It sets out our approach to preventing sexual harassment and explains the process for raising and addressing concerns.

Scope and Application

This policy applies to all employees of E Tech Group in India, regardless of role, seniority, or employment status. This includes permanent and fixed-term employees, probationers, consultants, interns, trainees, and contractors.

The policy applies equally to employees working from the Company's physical office in Pune, Maharashtra, employees working remotely or from home in Pune, Gujarat, or elsewhere in India, and interactions with clients, vendors, visitors, and other third parties in the course of work.

What Is Considered a Workplace?

For the purposes of this policy, "workplace" includes Company offices and premises, any place visited by an employee in the course of employment, remote and home-based work locations, virtual and digital work environments (including email, messaging platforms, video calls, and internal systems), and Company-organised or work-related meetings, events, training sessions, or travel.

What Is Sexual Harassment?

Sexual harassment includes any unwelcome physical, verbal, non-verbal, or digital conduct of a sexual nature that creates an intimidating, hostile, or offensive work environment.

Examples include unwanted physical contact or advances, requests or demands for sexual favours, sexually coloured remarks, jokes, or comments, displaying or sharing inappropriate or explicit content, or any conduct that interferes with an employee's dignity, safety, or ability to work.

Sexual harassment may occur regardless of intent and may involve individuals of any gender.

Zero Tolerance and Expected Behaviour

Sexual harassment is strictly prohibited at E Tech Group. All employees are expected to conduct themselves professionally, respectfully, and in line with Company values at all times.

Any behaviour that breaches this policy may result in disciplinary action, up to and including termination of employment, in accordance with applicable law.

Internal Committee (IC)

As required under the POSH Act, E Tech Group has constituted an Internal Committee (IC) to receive and address complaints of sexual harassment.

The Internal Committee includes a Presiding Officer who is a senior female employee, employee members with relevant experience or commitment to workplace equality, and an external member with expertise in women's rights or workplace-related matters.

Details of the current Internal Committee members and their contact information are made available to employees and can also be obtained from HR.

Raising a Complaint

Employees who experience or witness sexual harassment are encouraged to raise the matter as soon as possible.

A complaint may be made in writing or by email, directly to any Internal Committee member, or through Human Resources, who will ensure it is referred to the Internal Committee.

Complaints should ordinarily be submitted within three months of the incident (or the last incident, in the case of a series of incidents), in line with the POSH Act. Where required, reasonable assistance will be provided to help an employee submit a complaint.

Redressal Process

I. Conciliation

- i) Before initiating an inquiry and at the request of the Complainant, the IC may take steps to settle the matter between complainant and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.
- ii) If a settlement has been arrived at, the IC needs to record the settlement and forward the same to the employer of the company to take action as specified in the recommendation.
- iii) The IC needs to provide the copies of the settlement, as recorded, to the Complainant and the respondent.
- iv) Where a settlement has been arrived at, no further inquiry needs be conducted by the IC.
- v) However, in the event
 - a. no conciliation is requested for by the Complainant, or
 - b. no settlement has been arrived at between the parties, and / or

- c. if the Complainant informs the IC that any term or condition of the Settlement arrived at earlier has not been complied with, then, the IC, in the above situations, needs to proceed to inquire into the complaint.

II. Inquiry into complaint

- i) In case where a settlement is not feasible or could not be arrived at through conciliation, the IC shall conduct an inquiry into the complaint and complete the inquiry within 90 days from the date of receipt of the complaint.
- ii) Additionally, an inquiry may also be initiated if the aggrieved person informs the IC that any terms of settlement has not been complied with by the respondent.
- iii) The IC within seven working days of receiving the complaint shall forward one copy thereof to the respondent, for obtaining a response.
- iv) The respondent within ten working days of receiving the complaint shall file their reply to the complaint along with a list of supporting documents, names and addresses of witnesses.
- v) The IC shall consider the reply from the respondent and initiate an inquiry.
- vi) The complainant or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the IC.
- vii) The IC shall hear both the complainant and the respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.
- viii) If both parties involved are employees, they will be given an opportunity of being heard and a copy of the findings shall be made available to both, enabling them to make representation against the findings before the committee, during inquiry.
- ix) In conducting the inquiry, a minimum of three members of the IC including the Presiding Officer shall be present.
- x) In the event of a failure to attend a personal hearing before the IC by the complainant or the respondent on three consecutive dates (intimated in advance), the IC shall terminate the inquiry proceedings or give an ex-parte decision. However, the IC shall serve a notice in writing to the party(ies) 15 days in advance, before such termination or the ex-parte order.
- xi) At the commencement of the inquiry the IC will explain to both the complainant and respondent the procedure which will be followed in the inquiry.
- xii) No observations regarding the work and behaviour of either the complainant or respondent will be made which are not related to the alleged act of sexual harassment. However, the IC may consider as relevant any earlier complaints of sexual harassment against the respondent or false complaints against the complainant. The Committee will also consider the various myths and facts in relation to Sexual Harassment so as to give a well-thought-out decision.

Action during pendency

- i) During the pendency of an inquiry, on a written request made by the Complainant, the IC may recommend the Company to:
 - a. Transfer the Complainant or the respondent to any other workplace; or
 - b. Request the Complainant or the respondent to work from home; or
 - c. Grant leave to the Complainant up to a period of 3 months
- ii) The final decision, however, is left solely to the discretion of IC and the Company.
- iii) The leave granted to the Complainant will be in addition to the leave they would be otherwise entitled to.

Inquiry report

- i) All proceedings of the IC will be recorded and along with the statement of witnesses shall be endorsed by the complainant and respondent. The refusal to endorse the same by either party shall be noted by the IC.
- ii) On the completion of the inquiry, the IC will submit a written report to the Company within a period of 10 days from the date of completion of the inquiry and made available to the concerned parties. The inquiry report shall specify the details of the charges against the respondent, the evidence led in the inquiry and the reasons based on which the Committee has reached its decision.
- iii) If the IC forms the opinion that the respondent has indulged in sexual harassment in the workplace, an appropriate disciplinary action would be taken against them by the Company irrespective of their status in the Company. Disciplinary action will be initiated by Human Resources Department within 60 days from the date of receipt of the recommendations from the IC and may include any of the following:
 - a. The services of the employee would be terminated, or such action would be initiated as recommended by the IC
 - b. Where such conduct amounts to a specific offense under the Indian Penal Code or under any other law, a complaint will be made to the appropriate authority so that action in accordance with the prevailing law can be taken
 - c. Transfer of the complainant or the respondent, if the Company deems fit to do so based on the recommendations of the IC
 - d. To deduct from the salary of the respondent such sum as it may consider appropriate to be paid to the complainant.

Punishment for false or malicious complaint and false evidence

- i) If an employee is found to have raised a false complaint, then severe action will be taken against the employee. This may include verbal warning or suspension or termination from services of the Company as recommended by the IC.
- ii) A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.
- iii) The malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.
- iv) In case the IC arrives at a conclusion that during an inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Company to take action in accordance with the provisions of the service rules applicable to the employee. This may include verbal warning or suspension or termination from services of the Company as recommended by the IC.

Confidentiality and Protection from Retaliation

All information relating to complaints, inquiries, and outcomes will be treated confidentially, except where disclosure is required by law.

Retaliation against anyone who raises a concern, participates in an inquiry, or supports another employee is strictly prohibited and may result in disciplinary action.

Awareness and Training

E Tech Group is committed to ongoing POSH awareness and compliance. Employees will receive information and training to help them understand their rights, responsibilities, and the processes outlined in this policy.

Policy Review

This policy may be reviewed and updated from time to time to ensure continued compliance with Indian law and best practice.