

# **POSH POLICY - MULTITV TECH SOLUTIONS PVT. LTD.**

## **1. INTRODUCTION:**

- 1.1 MultiTV Tech Solutions Pvt. Ltd. is committed to providing a safe and harassment-free work environment for all employees, regardless of their gender, background, or position. This POSH Policy is in continuation of our ongoing POSH Policy and outlines our specific measures to prevent, prohibit, and redress sexual harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) and The Sexual Harassment (Prevention, Prohibition and Redressal) Rules, 2013.
- 1.2 The Company takes a strong stance against any form of sexual harassment. All efforts shall be made to ensure that all decisions of the Company are free of any discrimination. Prompt and strict disciplinary action will be initiated against any individual or group caught in engaging in any form of sexual harassment or discriminatory activities.
- 1.3 The Company is required by law to lay down guidelines and establish a forum for redressal of grievances related to sexual harassment in accordance with the laws prevailing in India. This policy takes complete cognizance of the latest legislation by the Government of India i.e. the “The Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and its notification published on 9th December 2013 (“Act”), as amended from time to time. The intent of this legislation is to provide protection against sexual harassment of women at workplace and matters connected therewith or incidental thereto.
- 1.4 This policy applies to the co-founders, employees, consultants, trainee associates, interns, external experts and people engaged on a project basis irrespective of their location within India or elsewhere.
- 1.5 This policy will be applicable in all work-related settings and activities, whether inside or outside the workplace, including business trips and social events organised with Team Members and any virtual workplaces or classrooms including WhatsApp Groups, all virtual meeting platforms, all productivity measurement or performance measurement or project management platforms. Any meeting or engagement required for any social work undertaken by the Company is covered by this policy.

1.6 The Company acknowledges that individuals covered by the scope of this policy shall be informed of this policy and will have access to the information needed to prevent sexual harassment. The Company will openly, publicly and widely display this policy together with the contact information of the designated Internal ICC members and external parties authorized to process complaints.

## **2. DEFINITION OF SEXUAL HARASSMENT:**

2.1 Sexual harassment includes any unwelcome behaviour of a sexual nature that:

- (i) Makes a hostile work environment for the victim.
- (ii) Physically, emotionally, or psychologically affects the victim's employment.
- (iii) Unreasonably interferes with the victim's work performance or creates an intimidating or offensive work environment.

2.2 Examples of sexual harassment include:

- (i) Unwanted physical contact, advances, or requests.
- (ii) Verbal harassment, including sexual jokes, comments, or taunts.
- (iii) Display of or circulation of pornographic or offensive material.
- (iv) Quid pro quo harassment, where benefits or employment opportunities are conditioned on sexual favors.
- (v) Threats or intimidation related to sex, etc.

2.3 All of the above acts are prohibited through any mode of communication including in person, over the phone, on voice mail, through pen and paper, on e-mail, over WhatsApp, Basecamp, inside of or outside of the workplace, through chat, through SMS or any other form of communication.

2.4 Sexual harassment does not include occasional compliments of a socially acceptable nature, or consensual personal and social relationships without a discriminatory act. However, please note that the company has a dating policy in place which restricts sexual or romantic relationships between Team Members or customers, and if you really want to engage in one, you must inform the management right away so that we can avoid a conflict of interest situation. Hence it should be clear that any romantic or sexual advances towards colleagues would be unacceptable and unwelcome. However, all such acts may not constitute sexual harassment unless the same is personally intimidating, hostile, or offensive.

2.5 Sexual harassment is to be decided based on measuring reasonableness for any sexual harassment complaint. It can be done by identifying whether the behaviour leading to a sexual harassment conduct is making the victim feel offended, ashamed or afraid. An objective test can be taken based on the condition that a person could have anticipated such conduct to cause a humiliating and intimidating effect. Further, the conduct must be considered within the context in which 'it occurs'. Certain conduct does not only refer to the frequency of occurrence, intimidated condition, but also refers to different situations.

2.6 Each member of the Company employees is obligated to follow this policy for themselves. This policy also obligates anyone to report any incident observed as a third party to any ICC members. It is the combined responsibility of the employees to withhold the values and principles of equal opportunity and zero discrimination for all involved.

**3. INTERNAL COMPLAINTS COMMITTEE (ICC):** MultiTV Tech Solutions has constituted an Internal Complaints Committee (ICC) with the following composition:

- Presiding Officer Pooja Pokhriyal – HR Manager
- Member 1: Vaishali Adlakha – Key Accounts Manager
- Member 2: Sushma Yadav - Sr.PHP Developer
- External member- Mr. Pawash Piyush (Director, PALS)

3.1 The ICC members will have a tenure of 3 years from the date of their appointment. Where any complaint arises against the Presiding Officer or any of the members of the ICC, the Presiding Officer or the member as the case may be, will recuse himself or herself from the proceedings and an alternate member shall be appointed in his or her position to the ICC by the Company Board of Directors, with exception of an accused board member to avoid any conflict of interest. In such instances, the complaint can be made to any of the committee members.

3.2 The ICC will be responsible to receive complaints; investigate every formal written complaint received by them under this policy; provide conciliation, if requested; recommend appropriate actions for punishment for any substantiated allegations of harassment; initiate appropriate legal actions wherever required, and take actions discouraging and preventing employment related harassment.

#### **4. REPORTING PROCEDURE:**

4.1 Any employee who feels they have been subjected to sexual harassment can file a complaint with the ICC in writing only. The complaint should include details of the incident, the accused person, and any witnesses.

4.2 Our company encourages employees to report incidents at the earliest possible stage to ensure prompt and effective action. Any complaint submitted after passing of 90 days of the incident being reported shall not be accepted unless the delay is justified with reasonable causes for such delay.

4.3 Once a complaint is accepted, the ICC will aim first and foremost for any form of resolution that is possible through conciliation to identify a possible case of misunderstanding and miscommunication and explore steps to amicably settle the matter between the complainant and the accused. The above process can only be initiated if the complainant agrees to the same.

#### **5. INVESTIGATION PROCESS:**

5.1 Upon receiving a complaint, the IC will initiate a confidential investigation within 7 working days. Both the complainant and the accused will have the opportunity to present their case and be heard.

5.2 If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer, work from Home option or administrative leave.

5.3 At the first meeting of the complaint committee, the complainant shall be heard and the complainant's statement is recorded (statement of allegation). The complainant can produce collaborative material with a documentary, oral material, etc., to substantiate her/his complaint.

5.4 Thereafter, the accused will be called to a meeting by the complaint committee and will be informed of the complaint and an opportunity will be given to the accused to give an explanation. Where the respondent accepts his/her mistake, the ICC shall record the same and close the proceedings with recommending appropriate action upon the offender. Where, the Respondent contests the allegation of the complainant, an "Enquiry" shall be conducted and the ICC can carry out its investigation proceedings which shall involve taking statements from the witnesses.

- 5.5 The complaint committee shall record all the proceedings of the enquiry.
- 5.6 The ICC 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.
- 5.7 The complainant shall be provided with a copy of the Statement of Defence submitted by the accused and will be given an opportunity to provide a reply to the Statement of Defence if considered necessary by the ICC and not a repetition of the complaint itself.
- 5.8 If the complainant or the accused desires any witness(es) to be called, they shall communicate in writing to the ICC the names of the witness(es) whom they are supposed to call.
- 5.9 If the complainant desires to tender any document by way of evidence before the complaint committee, she/he shall supply true copies of such documents to the complaint committee. Similarly, if the accused desires to tender any documents in evidence before the complaint committee she/he shall produce true copies of such documents to the complaint committee and will affix her/his signature on the same to certify it as true copy.
- 5.10 The committee will call upon all witnesses mentioned by both the parties starting with the witness of the Complainant.
- 5.11 All relevant disputed facts to be ascertained by corroboration with witness narratives and or other evidence.
- a. The complaint committee shall complete the “Enquiry” as soon as possible and communicate its findings and recommendations for disciplinary action to the appointing authority. The Disciplinary action may include Formal apology, whether public or private, Counselling, Written warning to the accused and a copy of it maintained in the employee’s file, Change of work assignment / transfer for either the accused or the complainant, Suspension or termination of services of the employee found guilty of the offence, Demotion of the employee found guilty of the offence, Direction to the accused to pay monetary compensation to the complainant, Suspension or termination of employment or Legal action in accordance with the POSH Act.
- 5.12 In the event the complaint does not fall under the purview of sexual harassment/the complaint on the face of it does not disclose an offence of

sexual harassment, the complaint committee may drop the complaint after recording the reason(s) thereof.

5.13 In case the complaint registered by the complainant is found to be false at any stage, the complainant will be subjected to appropriate disciplinary action.

5.14 In case the complaint is against any member of the Panel, such member shall not be allowed to be part of the enquiry committee.

5.15 The investigation will be completed within 90 working days, with possible extension for justifiable reasons.

## **6. CONFIDENTIALITY:**

The complaints shall be dealt with in an utmost confidential manner amongst all parties involved including the ICC members. Any violation of the confidentiality requirements will result in financial and legal action against the person who violates such requirements. The penalty for violation of confidentiality shall be determined by the ICC and in the event that any member of the ICC violates confidentiality, the remaining members shall determine the penalty. In the event that all or majority of the members of the ICC violate such confidentiality requirements, such members shall be removed from the ICC and the board of directors of the Company will determine the penalty.

## **7. AWARENESS AND TRAINING:**

MultiTV will conduct regular training programs for all employees on their rights and responsibilities under the POSH Act and this Policy.

## **8. MONITORING AND REVIEW:**

MultiTV will regularly review and update this POSH Policy to ensure its effectiveness in preventing and addressing sexual harassment.

## **9. NO RETALIATION:**

MultiTV strictly prohibits any retaliation against employees who file complaints or participate in investigations in good faith. Anyone found to be retaliating against a complainant or witness will face disciplinary action.

This POSH Policy is a key element of our commitment to providing such an environment and will be enforced fairly and consistently.

Effective Date: 01/01/2024

We are placing our ICC details in public domain. As such the detail of the members and the Contact Information are as follows:

For any questions or concerns regarding this POSH Policy, please contact:

- Internal Committee (IC): Email Id:[internalcommittee@multitvsolution.com](mailto:internalcommittee@multitvsolution.com)
- Designated Grievance Contact Person(s): +91 742 806 7933