Technologies Private Limited

Registered Office: Plot 196, Lane 8, Mahatma Society, Kothrud, Pune 411 038
Phone: +91-20-2536-0470, E-mail: contact@sayvm.com, CIN: U72900PN2023PTC218040

Policy on Sexual Harassment at Workplace

Date : 2/3/2026

Purpose-:

SayVM Technologies Private Limited is committed to provide a safe and congenial work environment to its employees, more particularly, women employees and ensure that they are not subjected any kind of sexual harassment. The Company appreciates that such harassment constitutes infringement of fundamental right to work in a safe and healthy environment and with this end in view and keeping in view the provisions of Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules there under, this Policy has been formulated. (Hereinafter referred to as SHWW Act. The said Policy is to define the guidelines and process to be followed in order to provide protection against sexual harassment of women at workplace and prevention and redressal of complaints of sexual harassment in addition to the matters connected therewith or incidental thereto. For any doubts or clarifications reference to be made to the SWHH Act the Rules there under.

Preamble

Sexual Harassment is not only a serious misconduct but is also a criminal offence, which can destroy human dignity and freedom. To promote the wellbeing of all female employees at the workplace, this Policy envisages as under,

i) It shall be the duty of the management of the establishment to prevent or deter the commission of any act sexual harassment at the workplace
ii) Sexual harassment will be considered as major misconduct and action will be taken on the basis of recommendation of IC and findings of the Inquiry in this context.

Applicability

This Policy shall be known as POSH Policy and Procedure to prevent Sexual Harassment of Women at workplace as framed in accordance with provisions of Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules there under (Hereinafter referred to as "Policy") and shall be applicable to all the employees of **SayVM Technologies Private Limited** employed at the workplace either directly or through any Contractor.

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1. Definitions

In this Policy unless the context otherwise requires, the words and expressions stated hereunder shall have the following meaning: -

Complainant Employee (CE): means any female employee as defined under section 2(a) of SHWW Act, who has lodged the complaint of sexual harassment at workplace and has been subjected to any act of sexual harassment by another employee. (hereinafter referred to as Respondent)

Internal Committee (IC): means Committee constituted in accordance with the section 4 of SHWW Act.

Management: Means Company's managing Director / Manager or such other officer/s or nominee/s as may be authorized in this behalf.

Respondent Employee (RE): means any employee against whom the complaint of sexual harassment has been lodged.

Sexual Harassment: means and includes one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

a) physical contact and advances.
b) a demand or request for sexual favors;
c) making sexually coloured remarks.
d) showing pornography.
e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

It further includes following amongst other circumstances,

i) **Verbal/Written:** Comments about clothing, personal behavior, or a person's body; sexual or sex-based jokes; requesting sexual favors or repeatedly asking a person out; sexual innuendoes; telling rumors about a person's personal or sexual life; threatening a person, sending emails or text messages of a sexual nature

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ii) **Physical:** Assault; impeding or blocking movement; inappropriate touching of a person or a person's clothing; kissing, hugging, patting, stroking

iii) **Nonverbal:** Looking up and down a person's body; derogatory gestures or facial expressions of a sexual nature; following a person

iv) **Visual:** Posters, drawings, pictures, screensavers, emails or text of a sexual nature

v) QuidProQuo ("This for that"): A person in a position of authority, typically a supervisor, demands sexual favors as a condition to getting or keeping a job benefit.

(i) implied or explicit promise of preferential treatment in the victim's employment.

(ii) implied or explicit threat of detrimental treatment in the victim's employment.

(iii) implied or explicit threat about the victim's present or future employment status.

(iv) interferes with the victim's work or creating an intimidating or offensive or hostile work environment for her and (4) humiliating treatment likely to affect the victim's health or safety.

(v) humiliating treatment likely to affect her health or safety

Explanation: Although a single unwanted request for a date or one sexually suggestive comment might offend one or be inappropriate, it may not be sexual harassment. However, a number of relatively minor separate incidents may add up to sexual harassment if the incidents affect one's work environment.

Workplace

As defined under section 2(O) of the SWHH Act and includes all offices, branches and workshops located anywhere in India. It also includes any place visited by the employee arising out of or during employment including the transportation provided by the Management of the establishment for undertaking the journey.

All other word and expressions not defined herein above shall carry and have same meaning as defined in section 2 of SWHH Act.

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2. Internal Committee (IC)

Committee shall be constituted in accordance with section 4 of SWHH Act and rules thereunder. It shall comprise of 5 persons as following,

i) Ms. Sayali Vaidya (Presiding Officer)
ii) Ms. Riya Gandhi (Member)
iii) Mr. Hrushikesh Kanase (Member)
iv) Ms. Anuja Terkar (External Member)

Every member of the committee shall hold the office for the period of three years from the date of nomination.

3. Behavioral Zones

Management has categorized individuals' actions in three behavioral zones as indicator to create the awareness about the gravity of the act, from amongst other the behaviors encountered at workplace.

GREEN ZONE BEHAVIOR (Acceptable not Sexual Harassment)

- Performance counseling
- Polite touching e.g. on the elbow
- Social interaction
- Showing concern
- Encouragement
- Polite compliment
- Friendly conversation

YELLOW ZONE BEHAVIOR (Use Caution)

- Violating personal "Space"
- Whistling (at someone)
- Questions about personal life
- Posters/calendars
- Off-color jokes
- Leering and staring
- Repeated requests for dates
- Foul language
- Unwanted correspondence/E-mails.
- Suggestive touching, sitting or gesturing.

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RED ZONE (STOP! Don't do it! *Always* Considered Sexual Harassment)

- Sexual favors in return for employment rewards
- Threats
- Sexually explicit (pornographic) pictures displayed/E-mails
- Criminal conduct/Sexual assault

4. Procedure of filing the Complaint

(a) Complaint should be made by the aggrieved female within the period of 3 months from the date of occurrence of incident and in case of series of incidents, within a period of three months from the date of last incidence. This Complaint by aggrieved female employee shall be made to IC in writing and be sent either by post or email or given in person to the IC of the establishment or any officer authorized by IC in writing.

(b) The IC may for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the employee from filing the complaint within the said period. Where the employee is unable to make the complaint on account of her physical or mental incapacity or death or otherwise, her legal heir may make the complaint. I

It is however, pertinent to state that if the aggrieved female employee is unable to file the complaint on account of her physical incapacity, complaint may be filed by

i) Her relative or friend or
ii) Her co-worker or
iii) An Officer of the National Commission for women or State women's Commission or
iv) Any person who has the knowledge of the incident with the written consent from the aggrieved female employee.

Where the aggrieved female employee is unable to file the complaint on account of her mental incapacity, complaint may be filed by

i) Her relative or friend or
ii) A special educator or
iii) A qualified psychiatrist or the psychologist or
iv) The guardian or the authority under whose care she is receiving treatment or care or
v) Any person who has the knowledge of the incident jointly with the relative or a friend or a special educator or a qualified psychiatrist or the psychologist or the guardian or the authority under whose care she is receiving treatment or care.

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5. Procedure to be followed post receipt of the Complaint

a) The IC would go through the details of the complaint and evaluate if there is prima facie case or not. While doing that, the IC shall keep in mind that the CE is not subjected to Inquiry more than once. However, the complaint complexity requires that the CE is to be called for more than once, then utmost sensitivity should be displayed and adequate precaution would be taken to ensure that there is no loss of dignity to the CE.
b) The IC shall initiate and conduct detailed Inquiry as deemed fit.
c) The IC,may before initiating the Inquiry and at the request of the CE,take steps to settle the matter between her and the RE through concialiation,provided that no monetary settlement be made as basis, of concialition.Where a settlement has been arrived during the conciliation, the IC shall record the settlement and forward it to the employer and District Officer to take action.However,if the terms arrived during conciliation have not been complied with by the RE,the IC shall proceed to make an Inquiry into the complaint or as the case may be forward the complaint to police. The copies of the settlement as recorded in the conciliation shall be provided to both parties.
d) The IC shall after complete the Inquiry, submit its recommendations to the management with recommendations of the penalty to be imposed.
e) In case no settlement is arrived the IC, shall, proceed to make Inquiry into the complaint in accordance with the service rules or the standing orders applicable to the Respondent and where no such rules exist or standing orders do not apply, in accordance with principles of natural justice by giving an opportunity to be heard and provide copies to enable parties to make representation.
f) The IC,if finds the RE to be guilty, then may recommend payment of such sums as it may consider appropriate, to the aggrieved female employee, to be recovered from the wages of RE,subject to the provisions of section 15 of SWHH Act.
g) The IC shall submit its recommendations upon by completing the Inquiry within three months from the date of receipt of the complaint.
h) HR/Administration department shall extend full cooperation and support in facilitating to conduct the proceedings by the IC.

6. Guideline to be kept in mind by IC while recommending the action

a) To conduct the Inquiry as per the principle of natural justice and in a confidential manner.
b) In case where the IC has recommended to the management for compensation to be made to the CE, then the said amount shall be deducted from the salary of the RE and paid to CE or her legal heir/s

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c) In case the RE fails to pay the sum as referred above, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

d) Where the IC arrives at a conclusion that the allegation against the RE is malicious or the CE has made the false complaint knowing it to be false or the CE has produced forged or misleading document, it may recommend to the management of the establishment to take action against the CE as stipulated under section 14 of SWHH Act.

e) Where the IC arrives at a conclusion that during the inquiry any witness has given false evidence or produced forged or misleading document it may recommend to the management of the establishment to take appropriate action.

7. Management shall ensure

a) That in case of complaint against any of the members of the IC,the management shall reconstitute the committee after making due investigation of the complaint. In all such case the guidelines stated hereinabove would be inclusive of the time taken to reconstitute the committee.

b) The management shall provide assistance to the CE,if she chooses to file the police complaint in relation to the offence under Indian Penal Code or any other law for the time being in force.

c) The management shall also initiate action under the Indian Penal Code or under other law for the time being in force, against the perpetrator, where the perpetrator is not an employee of the establishment and there is a complaint of sexual harassment against the perpetrator in the workplace where the harassment took place.

d) The management shall direct the HR/Administration department to ensure display at the conspicuous place the guideline as given in section 19 (b) of the SWHH Act.

e) The management shall direct and monitor the HR/Administration department to create awareness amongst the employee on sexual harassment policy and the procedure through following amongst other means

i) Training cum Awareness session for employees (men and women)

II) Training cum Awareness session for IC members

III) Training cum Awareness session for HR team and Senior managers

f) The management will assist in ensuring the attendance of the RE and witnesses before the IC as the case may be.

g) The management shall monitor timely submission of the report. For this it shall conduct periodic update meetings with IC members and HR/Administration dept to ensure that the said policy is being implemented in letter and spirit

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8.Appeal by the aggrieved person

Any person aggrieved by the recommendations made by the IC inquiring with allegations against the RE has not proved, or the IC arrived at a conclusion that during Inquiry any witness has given false evidence or produced forged or misleading documents or contravenes the provisions of section 17 of SWHH Act or when the person entrusted with the duty to handle or deal with the complaint, the inquiry or recommendations makes known the contents of the complaint and Inquiry proceedings, or non-implementation of such recommendations may prefer an appeal to the court or tribunal in accordance with the service rules applicable to the said person, or where the service rules do not exist then without prejudice to the provisions contained in any other law for the time being in force, the person aggrieved may prefer an appeal. The appeal will lie before Appellate Authority notified under Standing orders.

8. The CEO will ensure an appropriate corrective action on the recommendations of the IC and keep the CE informed of the same.

Corrective action may include any of the following:

- Formal apology
- Counselling
- Written warning to the perpetrator, a copy of which, will be maintained in the employee's file.
- Compensation as recommended by the IC
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the respondent employee found guilty of the offence.
- Lodge a complaint with appropriate legal authority.
- Any other action, solution

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9 Frivolous or Malicious nature of Complaint / Abuse of the process:

In case the complaint is found to be false, frivolous, malicious (making a complaint it to be untrue or biased in anyway etc., the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

9. Confidentiality:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the CE/victim's interest in keeping the matter confidential.
To protect the interests of the CE/victim, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

10. Access to Reports and Documents:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary, legal or other remedial processes.

11. Protection to the Aggrieved Person/Victim:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any such reprisal may become a cause of a separate investigation.

The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

12. Responsibilities regarding Sexual Harassment:

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All employees of the Company have a personal responsibility to ensure that Individual behavior is not contrary to this policy and ensure an environment free from sexual harassment.

13. Annual Report

The IC shall submit annual report to the management outlined in the SWHH Act and it shall be the responsibility of the management to ensure that the said annual report is also filed with District Officer in prescribed format.

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