

POSH (Prevention of Sexual Harassment) Policy

Aletheia Technologies Pvt. Ltd.
Effective from 1st November 2025

1. Preamble

This Policy has been framed in accordance with the provisions of *The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* and the Rules framed thereunder (“the Act”). While the Policy covers all key aspects of the Act, any clarification shall be referred to the Act, and its provisions shall prevail.

Aletheia Technologies Pvt. Ltd. is committed to providing a safe, healthy, and dignified workplace free from prejudice, gender bias, and sexual harassment. Sexual harassment violates a woman’s fundamental rights to equality (Articles 14 and 15), her right to life with dignity (Article 21), and her right to practise any profession or occupation in a safe environment.

Sexual harassment is also a violation of universally recognized human rights under international conventions such as the *Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)*, ratified by India on 25 June 1993.

This *Policy on Prevention of Sexual Harassment of Women at the Workplace* aims to ensure protection, prevention, and redressal of complaints of sexual harassment and related matters.

2. Related Indian Law

No employee of Aletheia Technologies Pvt. Ltd., nor any consultant, service provider, contractor, intern, visitor, or any person associated with the company, shall engage in any act of sexual harassment against any woman. Any occurrence of such misconduct will be treated as gross misconduct and will invite disciplinary action as per the company’s disciplinary procedures.

This Policy is framed strictly in compliance with the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*.

3. Scope

This Policy covers **all complaints of sexual harassment** committed by any employee against any woman connected with the workplace, regardless of whether the incident occurred within company premises or outside, if it constitutes a workplace under the Act.

All complaints shall be addressed strictly in accordance with the Act.

4. Definitions

4.1 Employee

Any person employed by Aletheia, directly or indirectly, including contract workers, consultants, temporary employees, probationers, trainees, interns, apprentices, and volunteers — whether paid or unpaid.

4.2 Employer

A person responsible for managing, supervising, and controlling the workplace.

4.3 Aggrieved Woman

Any woman, of any age, whether employed or not, who alleges sexual harassment by a respondent. Includes contractual workers, interns, visitors, and any woman present at the workplace.

4.4 Respondent

A person against whom a complaint is filed.

4.5 Workplace

Includes all offices, branch locations, client sites, guest houses, work-related travel, and transportation provided by the company. Includes any location visited during work or arising out of employment.

4.6 Sexual Harassment

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether direct or implied):

a) Physical conduct:

Unwanted physical contact, sexually suggestive gestures, or advances.

b) Verbal conduct:

Unwelcome sexual innuendoes, remarks, jokes, comments about a person's body, sexually coloured remarks, or suggestive comments.

c) Non-verbal conduct:

Indecent exposure, displaying sexually explicit material in any form.

d) Online / Virtual conduct:

Sharing obscene content, inappropriate messages, suggestive emojis, or behaviour during virtual meetings.

e) Circumstances amounting to sexual harassment:

- Promise of preferential treatment
- Threat of detrimental treatment
- Threat regarding employment status
- Interference with work, creating a hostile environment
- Humiliating treatment affecting health, safety, or self-esteem

4.6.1 Virtual Sexual Harassment – Do’s and Don’ts

Do’s:

- Maintain professional attire during video calls.
- Keep discussions work-related.
- Use neutral, appropriate backgrounds.

Don’ts:

- No attire such as vests, shorts, or suggestive clothing.
- No inappropriate jokes or suggestive posters/objects in the background.
- Managers must not insist on women joining one-on-one video calls on video mode.
- Late-night video calls should be avoided. If unavoidable, audio-only mode may be used.

5. Policy Statement

All employees of Aletheia shall:

- a) Maintain dignity, respect, and professionalism.
- b) Ensure a harassment-free workplace.
- c) Refrain from committing any form of sexual harassment.
- d) Understand that complaints will be handled seriously and confidentially.
- e) Be protected against retaliation.
- f) Avoid filing false or malicious complaints.

6. Internal Complaints Committee (ICC)

Composition

The ICC shall consist of:

1. **Presiding Officer** – A senior woman employee
2. **Two Employee Members** – Experienced in women’s welfare or legal knowledge

3. **One External Member** – From NGO or expert in women’s rights
4. **Tenure:** 3 years

The ICC may delegate authority to subcommittees as required.

7. Grievance Procedure

Filing a Complaint

- Complaint must be filed within **3 months** of the incident.
- Must be in writing or via signed email.
- Complaints may be submitted to any ICC member, HR, or through the whistleblower mechanism.
- If the complainant wishes to keep her identity confidential, she may write directly to the Managing Director.

Inquiry Process

- ICC will meet the complainant within **7 days**.
- If complaint does not fall under sexual harassment, ICC may close it with written reasons.
- Respondent will receive a copy of the complaint and must reply within **10 working days**.
- Both parties may submit written statements, evidence, and witnesses.
- The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- ICC must complete the inquiry within **90 days**, and report should be submitted within **10 days** thereafter to the Managing Director.

Ex-parte Decisions

If either party fails to appear for **3 consecutive hearings** without valid cause, ICC may proceed ex-parte after giving 15 days’ notice.

Outcomes

- **If complaint not proved:** Matter closed.
 - **If respondent is guilty:** Disciplinary action as per policy (*Refer to Clause 12*)
 - **Appeal:** Allowed within **90 days** of ICC recommendations.
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8. Conciliation

Allowed only at the complainant’s request, without any monetary settlement. If settlement is reached and violated, ICC must resume inquiry.

9. Essential Requirements of a Complaint

Must include:

- Detailed description of incident
 - Date, time, and place
 - Specific acts committed
 - Names of witnesses
 - Supporting evidence (if available)
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10. Responsibilities of Management

Management shall:

- Treat sexual harassment as serious misconduct
 - Conduct regular awareness sessions
 - Train ICC members
 - Provide necessary facilities to ICC
 - Assist complainants in filing police complaints if requested
 - Display policy at conspicuous places
 - Ensure compliance with the Act
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11. Responsibilities of Employees

- Read and understand the policy
 - Maintain confidentiality
 - Cooperate with inquiries
 - Promptly report incidents
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12. Action for Sexual Harassment

The ICC may recommend:

- Written apology
- Warning or reprimand
- Withholding promotion or increments
- Deduction of salary
- Transfer
- Termination
- Mandatory counselling
- Financial compensation

- Filing of criminal case (in severe cases)
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13. Malicious Complaints

If ICC concludes that the complaint is false or malicious, disciplinary action may be taken. *Lack of evidence does not mean complaint is malicious.*

14. Confidentiality

All details of the complaint, parties, witnesses, and proceedings shall remain confidential under the law.

15. Applicability

This revised Policy is effective from **1st November 2025**.

16. Internal Complaints Committee (ICC) Composition

To ensure a standardized, impartial, and robust approach to handling complaints of sexual harassment across all regions, Aletheia Technologies Pvt. Ltd. has restructured the POSH governance mechanism and constituted a **single Central Internal Complaints Committee (ICC)**. This central ICC will cover all locations and offices of the company.

Central Internal Complaints Committee (ICC) – Core Committee

Chairperson (Presiding Officer):

- **Ms. Ambreen Shawl – GM Operations**

Members:

1. **Mr. Mahesh Bhawsar – Group Head, Finance & Accounts**
2. **Ms. Arpana Singh – HR & Administration**
3. **Mr. Syed Suheel – External Expert**

All complaints arising from the Corporate Office or any regional location shall be handled by the above-mentioned ICC at the company's Head Office in Mumbai, Maharashtra.

Important Notes

- As mandated by law, the ICC shall include an **external member** familiar with matters related to sexual harassment, ensuring independence and neutrality.
 - **Quorum:** A minimum of **three (3) members**, including the Chairperson, must be present for conducting the proceedings.
 - If any ICC member resigns or ceases to be associated with the company for any reason, management shall appoint a replacement **within 30 days**.
 - ICC members, including the Presiding Officer, shall hold office for a maximum period of **three years** from the date of their nomination.
 - The external member shall be paid such fees or allowances as mutually agreed between the management and the member.
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General Instructions

Protection Against Victimization (Interim Relief)

The company is duty-bound to protect complainants from retaliation, intimidation, or undue pressure. During the pendency of the inquiry:

- The aggrieved woman may seek **transfer of herself** or **transfer of the respondent** to another department, branch, or location.
- She may also avail **leave up to 3 months**, in addition to her regular leave entitlement.

Third-Party Harassment

If sexual harassment occurs due to the act of a third party or outsider (e.g., client, vendor, visitor), the company shall take all necessary steps to support the affected woman and initiate preventive action.

Annual Report

The ICC shall prepare an Annual Report at the end of each calendar/financial year, detailing:

- Number of complaints received
- Number of complaints disposed
- Cases pending more than 90 days
- Nature of actions taken

This report shall be submitted to Management and to the appropriate statutory authorities as prescribed under the Act.

Modification and Review of the Policy

The Company reserves the right to revise, modify, or amend this Policy consistent with legal requirements or organizational needs. All modifications shall be duly communicated to employees.

Policy Availability

The Policy shall be made available to all employees via the **Aletheia HRMS Portal**.

Mechanisms to Strengthen Implementation of the Policy

Aletheia Technologies Pvt. Ltd. will ensure strong POSH compliance through:

- a) Communication of this Policy and ensuring all employees have access to it.
 - b) Display of the ICC constitution and penal consequences of sexual harassment at conspicuous places.
 - c) Inclusion of POSH Policy in the corporate induction program.
 - d) Regular workshops and training sessions for the ICC members and awareness programs for employees.
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Frequently Asked Questions (FAQs)

1. What is sexual harassment?

Sexual harassment includes unwelcome acts such as physical contact and advances, demands for sexual favors, sexually coloured remarks, showing pornography, and any unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

2. When is conduct considered unwelcome or harassing?

When such behaviour—explicit or implicit—interferes with work performance, creates a hostile environment, or makes a person feel unsafe, intimidated, or humiliated.

3. What is NOT sexual harassment?

Occasional compliments of a socially acceptable nature or friendly, respectful interactions that are welcome and not offensive do not amount to sexual harassment.

4. What are the responsibilities of employees?

Employees must avoid any form of sexual harassment and report incidents promptly to the designated authorities.

5. What happens after an incident is reported?

The ICC conducts a confidential, impartial inquiry. If allegations are proven, disciplinary action is taken as per policy.

6. Can an employee report sexual harassment anonymously?

Anonymous reports may alert the ICC to monitor behaviour, but for a formal inquiry, a **signed written complaint or email** from the aggrieved woman with her details is required.

8. What support services are available?

The company offers counselling and other support services to help victims manage emotional distress.

9. What training is provided?

The company conducts regular POSH awareness training for all employees and specialized orientation programs for ICC members.

10. How does the organization ensure confidentiality?

All proceedings, including identities and complaint details, are kept strictly confidential as mandated by the Act.

11. What are the consequences of false accusations?

If a complaint is proven to be false and malicious (not simply unproven), strict disciplinary action may be taken against the complainant.

12. Is the POSH Policy applicable only to employees?

No. It applies to **all women** present at the workplace—including visitors, clients, customers, vendors, freelancers, and consultants.

13. What if an employee is accused by a woman from another company?

The ICC of Aletheia will investigate the complaint and disciplinary action will be taken if proven.

14. What should an employee include while filing a complaint?

Name of the respondent, date, time, place, detailed incident description, witnesses, and any supporting evidence.

15. Can a complainant prevent gossip?

Yes. The complainant, respondent, ICC members, and all involved parties are legally bound to maintain confidentiality.

16. Who should an employee contact for clarification?

The ICC members or HR can be contacted for queries related to the POSH Policy.

17. Can parties produce witnesses or records?

Yes. Parties may produce witnesses or request ICC to call them. ICC may also request relevant records from management.

18. Should victims discuss incidents with colleagues?

No. Details should be shared only with ICC or HR. Colleagues should not attempt to investigate or intervene.

19. What if an employee of Aletheia is accused by a vendor/another company?

Such cases will be investigated by the ICC of the respective organization. Aletheia will cooperate as needed.

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