

Innefu Labs – Prevention of Sexual Harassment (POSH) Policy

Policy Name	POSH Policy
Policy Version	1.1
Policy revision Date	01/6/2025
Policy Effective Date	01/6/2025
Policy Revised by	Human Resources
Policy Reviewed by	Directors
Policy Approved by	Directors

1 Purpose

This policy sets out Innefu Labs Limited's commitment to providing a safe, respectful and inclusive workplace that is free from sexual harassment, gender-based discrimination and related misconduct. It fulfils the requirements of the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* ("POSH Act"), associated Rules 2013 and all relevant Delhi-NCT notifications, while embedding the governance, measurement and continuous-improvement practices expected of Innefu Labs Limited.

2 Scope

The policy applies to:

- All employees (permanent, temporary, probationers, trainees, apprentices and interns as per the POSH Act 2013)
- Contract labor, consultants, vendors, clients and visitors when they are at any workplace controlled by Innefu Labs or interacting with it's employees either in person or virtually.
- All work-related settings and activities, including but not limited to company premises, client sites, business travel, conferences, off-sites, virtual/online collaboration platforms and any social events organized or sponsored by the company.

3 Definition

Sexual Harassment (as per Section 2(n) of the POSH Act) includes—

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

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The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

1. implied or explicit promise of preferential treatment in employment; or
2. implied or explicit threat of detrimental treatment in employment; or
3. implied or explicit threat about present or future employment status; or
4. interference with work or creating an intimidating or offensive or hostile work environment; or
5. humiliating treatment likely to affect health or safety.

Aggrieved Woman/Person / Complainant – In line with the POSH Act, any employee or non-employee who alleges sexual harassment; Innefu extends equal protection to persons irrespective of gender

Respondent – A person against whom a complaint is made.

Workplace – Any location (physical or virtual) where work-related activities are performed or employment-related interactions occur.

Employee means a person employed at a workplace for any work on regular, temporary, *ad hoc* or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

Employer means any person responsible for the management, supervision and control of the workplace. Management includes the person or board or committee responsible for formulation, implementation and administration of policies.

Internal Committee means a Committee constituted by the Company as per this Policy and includes all Locations

Any other term not defined herein shall have the same meaning as defined in the Act or any other applicable law.

4 Policy Statement

Innefu Labs maintains zero tolerance toward sexual harassment. Every individual covered by the policy has the right to work in an environment free from unwelcome behavior of a sexual nature and the responsibility to uphold this principle. Allegations will be handled promptly,

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fairly and confidentially, and proven misconduct will result in proportionate disciplinary action up to and including termination.

5 Roles & Responsibilities

Role	Key Responsibilities
Management / Board	Provide resources, approve policy, review POSH metrics and corrective-action plans.
Head – HR (Policy Owner)	Maintain the policy, ensure compliance, coordinate training, publish annual reports, oversee continuous-improvement actions.
Internal Committee (IC)	Receive and inquire into complaints, recommend actions, maintain records, submit reports.
Employees & Associates	Respect the dignity of co-workers, participate in training, report incidents or cooperate in inquiries.
Team Leaders / Managers	Model appropriate behavior, creates safe team culture, escalate complaints, support interim measures.

6 Internal Committee (IC)

6.1 Composition

- **Presiding Officer:** Senior woman employee of reputable standing.
- **Members:** Minimum 4 in total, with at least 50% as women.
- **External Member:** From an NGO or organization familiar with women's issues/sexual harassment law and having knowledge of POSH Law
- **Term:** 3 years from appointment or as amended by law.

6.2 Powers & Functions

- Receive written or verbal complaints of sexual harassment.
- Conduct inquiries in accordance with principles of natural justice.
- Recommend management for the corrective/disciplinary actions.
- Suggest interim relief (transfer, leave, project change, etc.).
- Submit final report to HR Head & CEO within 10 days of inquiry completion.
- Maintain strict confidentiality and secure record keeping.

7 Complaint Mechanism

1. Lodging a Complaint

- Written complaint has to be filed (hard copy or email to posh@innefu.com) within 3 months from the date of the incident/last incident.

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- Wherever necessary, the IC may extend this limit by up to 3 additional months for justifiable reasons.
 - If the Complainant, for any other reason, is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with his or her written consent.
2. **Assistance** – The IC will provide help in drafting/filing a complaint where the aggrieved person is unable to do so.
 3. **Settlement** – Before initiating inquiry, the IC may attempt conciliation, *only* at the request of the aggrieved person and without monetary settlement.

8 Inquiry Process

Step	Timeline	Activity
Preliminary Scrutiny	≤ 7 days	IC validates jurisdiction & sufficiency, issues notices to parties.
Initial Response	< 10 days	The Respondent shall file his or her reply, along with the list of documents and names and addresses of witnesses.
Detailed Inquiry	≤ 90 days	Hear both parties, examine evidence/witnesses, record proceedings.
Report Submission	≤ 10 days	IC submits findings & recommendations to CEO/HR Head.
Implementation	≤ 60 days	Management acts on recommendations; HR communicates outcome.

9. Points to Note

1. The complaint must be accompanied by all relevant supporting documents and the names and addresses of any witnesses.
2. If the complaint does not fall under the purview of 'sexual harassment', it may be taken up as per the Company's Code of Conduct.
3. Legal representation is not permitted for either party during proceedings before the Internal Committee.
4. The IC shall have the right to terminate the inquiry proceedings or give an *ex-parte* decision, if the Complainant or Respondent fails, without sufficient cause, to present themselves for 3 consecutive hearings convened by the Presiding Officer.

However, such termination or *ex-parte* order may not be passed without giving a notice, in writing, 15 days in advance to the party concerned.

5. During the pendency of an inquiry and on a written request by the Complainant, the IC

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may provide such relief as it may deem appropriate and in line with other applicable statutory laws.

6. The IC shall have the same powers as are vested in the Civil Court under the Code of Civil Procedure, 1908, while conducting an inquiry.

10. Interim Measures

IC may, during inquiry, recommend:

- Transfer of either party.
- Grant of paid leave to the aggrieved person.
- Suspension of the respondent.
- Other measures necessary for protection.

11. Outcome & Disciplinary Action

- **Substantiated Complaint** – Disciplinary action proportionate to gravity: written apology, warning, deduction of wages, demotion, termination, withholding promotion/increment, mandatory counselling, community service, etc.
- **Compensation** – IC may recommend payment to the aggrieved person, and compensation may be recovered from respondent.
- **Unsubstantiated Complaint** – No adverse action will be taken against the Complainant; instead counselling shall be offered as and when required.
- **Malicious Complaint/Evidence** – If complaint is found deliberately false, IC may recommend action against the Complainant, following due inquiry (protecting genuine complaints from penalty).

12. **Confidentiality** All proceedings, identities and information shall remain confidential as per Section 16 of the POSH Act. Violation is subject to disciplinary action under company rules and applicable law.

13. **Protection Against Retaliation** Innefu Labs prohibits victimization or retaliation against any individual who, in good faith, reports sexual harassment or participates in an inquiry. Retaliation complaints shall be investigated as separate misconduct and attract severe penalties.

14. Awareness, Training & Communication

- **Induction:** POSH orientation for all new hires within 30 days.
- **Annual E-Learning/Workshop:** 100 % coverage; tracked in LMS.
- **Manager & IC Certification:** Advanced workshops every 12 months.
- **Visual Display:** Policy abstracts on noticeboards, screensavers, intranet banners.
- **Vendor/Contractor Briefings** before engagement.

15. Record Keeping & Reporting

- HR maintains a secure POSH register (electronic, access-controlled) with complaint details, inquiry minutes, reports and actions for 7 years.

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- Annual Report to District Officer (Delhi) by 31 January containing number of cases filed/disposed, training conducted, etc.
- Quarterly POSH metrics dashboard (see point no 16) presented to the HR Governance Council & Board Audit Committee.

16. Audit & Continuous Improvement

Metric	Target	Frequency	Owner
Complaint Resolution Cycle Time	≤ 60 days	Monthly	HR Head
Training Coverage	≥ 99 %	Quarterly	HR Head
Employee Awareness Score (survey)	≥ 90 %	Semi-annual	HRBP
Repeat Incidents	0	Continuous	IC

- Data collected via HRIS; analyzed under *Quantitative Project Management*.
- **Root-Cause Analysis (RCA)** and **Corrective & Preventive Action (CAPA)** logged in organizational process asset library.
- **Internal POSH Process Audit** – Twice yearly; findings feed into organizational process improvement plan (OPF, CAR/KPA).

17. Legal Compliance & References

- *Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013* & Rules 2013.
- Section 354A, Indian Penal Code 1860.
- Delhi Government notifications & guidance.
- Innefu Labs Employee Handbook, Code of Conduct, Disciplinary Policy.

18. Review & Amendment

The HR Head shall review this policy annually, or earlier if required by law or internal process changes, and present recommended amendments to the Board for approval. Changes become effective upon Board approval and company-wide communication.

19. Effective Date & Communication

This policy becomes effective on **01 June 2025** and supersedes all prior versions. It is available on the Intranet, emailed to all employees and displayed on noticeboards in every unit.

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20. Policy Approval

Name	Title	Signature	Date
Deepak Singh	Head – Human Resources		
Tarun Wig	Chief Executive Officer		
Swati Nagpal	Presiding Officer – IC		

Annexure A – Internal Committee Members of Innefu Labs

Name	Title	Email ID
Swati Nagpal	Presiding Officer	swati.nagpal@innefu.com
Shatakshi Shrivastav	IC Member	shatakshi.srivastava@innefu.com
Alka Syohi	IC Member	alka.syohi@innefu.com
Sudhir Kumar	IC Member	sudhir.kumar@innefu.com
Meghna Makkar	External Member in IC	makkarmeghna@matrixlife.in

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