

# **Prevention of Sexual Harassment (POSH) Policy & Standard Operating Procedure**

## **1. Purpose**

This Policy and Standard Operating Procedure (SOP) aims to prevent, prohibit, and redress sexual harassment and abuse at the workplace. The organization is committed to providing a safe, respectful, and inclusive work environment free from harassment, abuse, intimidation, or physical harm.

## **2. Scope**

This policy applies to:

- All employees (permanent, probationary, temporary, contractual)
- Interns, trainees, consultants, freelancers
- Vendors, clients, visitors, and any third party interacting with employees
- All work-related locations including office premises, offsite meetings, client locations, work travel, and virtual workplaces

## **3. Policy Statement**

The organization maintains **zero tolerance** towards:

- Sexual harassment in any form
- Physical abuse or corporal punishment
- Physical contact intended to injure, threaten, or intimidate
- Any disciplinary action causing physical discomfort

All complaints will be handled with confidentiality, fairness, and without retaliation.

## **4. Definition of Sexual Harassment**

Sexual harassment includes, but is not limited to:

- Unwelcome physical contact or advances
- Requests or demands for sexual favors
- Sexually colored remarks or jokes
- Showing or sharing pornographic or offensive material
- Any unwelcome verbal, non-verbal, or physical conduct of a sexual nature

## **5. Internal Review Committee (IRC / ICC)**

The organization shall constitute an **Internal Review Committee (IRC) / Internal Complaints Committee (ICC)** in line with applicable law.

**DeepSense Digital Solutions Private Limited**

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CIN NO: U51909TN2016PTC112834; www.deepsense.in

**Composition:**

- Presiding Officer (Senior woman employee)
- At least two employee members
- One external member with experience in social work / women's rights / legal knowledge

The committee shall function independently and impartially.

**6. Reporting & Complaint Mechanism**

- Complaints may be submitted in writing (email, letter) to the IRC/HR.
- Complaints can be raised by the aggrieved individual or on their behalf.
- Anonymous complaints will be reviewed based on merit.
- Complaints should ideally be filed within the prescribed timeline; extensions may be granted where justified.

All complaints shall be **documented and handled confidentially**.

**7. Standard Operating Procedure (SOP)****Step 1: Receipt of Complaint**

- Complaint is acknowledged by the IRC.
- Confidential records are created and securely stored.

**Step 2: Preliminary Review**

- IRC assesses whether the complaint falls under POSH.
- Interim relief may be recommended if required.

**Step 3: Investigation**

- Both parties are given an opportunity to be heard.
- Evidence, witness statements, and documentation are reviewed.
- Proceedings are conducted respectfully and confidentially.

**Step 4: Findings & Report**

- IRC submits a written report with findings and recommendations within the defined timeline.

**Step 5: Management Action**

- Management acts on the recommendations.
- Disciplinary actions may include warning, suspension, termination, or other corrective measures.

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#### 8. Protection Against Retaliation

- Retaliation against complainants, witnesses, or committee members is strictly prohibited.
- Any retaliation will result in disciplinary action.

#### 9. Confidentiality

- All details related to complaints, investigations, and outcomes shall be kept strictly confidential.
- Breach of confidentiality will invite disciplinary action.

#### 10. Awareness & Training

- POSH awareness sessions shall be conducted periodically.
- Committee members shall receive appropriate training.

#### 11. Record Keeping & Reporting

- Records of complaints, investigations, and actions taken shall be maintained securely.
- Annual reporting shall be completed as required by law.

#### 12. False or Malicious Complaints

- Malicious complaints, if proven, may attract disciplinary action.
- Inability to prove a complaint does not imply malicious intent.

#### 13. Roles & Responsibilities

- **Top Management:** Policy enforcement and support
- **IRC/ICC:** Fair and timely investigation
- **HR:** Policy implementation and record management
- **Employees:** Compliance and respectful conduct

#### 14. Review & Amendment

This policy shall be reviewed periodically and updated as required to remain compliant with statutory requirements.

**Approved by:** Directors

**Effective Date:** \_\_\_\_\_

**Review Cycle:** Annual or as required



**Rakesh R - Director  
Deepsense Digital Solutions Pvt**

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