

## **Prevention of Sexual Harassment (POSH) Policy**

### **Statement & Objective**

Frog Innovations Ltd. is committed to providing a safe, secure and dignified working environment for all women employees, free from sexual harassment. This policy is framed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder ("POSH Act").

The objective of this policy is to:

- Prevent the occurrence of sexual harassment at the workplace
- Prohibit all forms of sexual harassment
- Provide a robust redressal mechanism for complaints of sexual harassment

### **Scope**

This policy applies to:

- All women employees (permanent, temporary, contractual, interns, trainees, consultants)
- Visitors, clients, vendors and any women present at the workplace
- Any location that qualifies as a workplace under this policy

### **Definitions**

#### ***Aggrieved Woman***

A woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

#### ***Respondent***

A person against whom the aggrieved woman has made a complaint of sexual harassment.

#### ***Sexual Harassment***

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- Physical contact and advances
- A demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

#### ***Workplace***

Workplace includes, but is not limited to:

- Office premises, branches and units
- Any place visited by an employee in the course of employment
- Transportation provided by the company
- Client or vendor locations
- Hotels and guest houses during official travel
- All virtual platforms including emails, video calls, messaging apps and collaboration tools

**Internal Complaints Committee (ICC)**

In accordance with the POSH Act, the Company has constituted an Internal Complaints Committee (ICC).

The ICC shall consist of:

- A senior woman employee as Presiding Officer
- At least two employee members committed to the cause of women or experienced in social work / legal knowledge
- One external member from an NGO or association committed to the cause of women or familiar with issues relating to sexual harassment
- At least 50% of the members shall be women
- Tenure of ICC members shall be 3 years

**Filing a Complaint**

- A complaint must be made in writing within 3 months of the incident
- This period may be extended by another 3 months if circumstances prevented earlier filing
- In case the complainant is unable to file due to physical or mental incapacity, her legal heir, relative, colleague, friend or guardian may file on her behalf
- If someone files a complaint for a woman who has faced sexual harassment, it must be done only after she gives her written consent. The complaint should include:
  - ✓ Date and details of incident(s)
  - ✓ Name of respondent
  - ✓ Location of incident
  - ✓ Supporting documents or witness details (if any)

**Conciliation**

At the request of the aggrieved woman, the ICC may attempt to resolve the matter through conciliation. No monetary settlement shall be made as a basis of conciliation.

**Inquiry Procedure**

- If conciliation is not opted for or fails, the ICC shall conduct a formal inquiry
- Both parties shall be given the opportunity to be heard
- The inquiry will be completed within 90 days
- A report will be submitted to the employer within 10 days of completion
- The employer shall act on the recommendation within 60 days

**Interim Relief**

During the pendency of the inquiry, the ICC may recommend:

- Transfer of the aggrieved woman or the respondent
- Grant of leave up to 3 months to the aggrieved woman
- Change of reporting manager or duties

**Action on Proven Misconduct**

Based on the findings of the ICC, appropriate disciplinary action shall be taken which may include:

- Written warning
- Suspension
- Termination
- Mandatory counselling

- Any other action as per service rules

**False or Malicious Complaints**

Action may be taken against the complainant only if the ICC concludes that the complaint was made with malicious intent after proper inquiry. Lack of evidence will not amount to a false complaint.

**Confidentiality**

All proceedings under this policy shall be confidential. Breach of confidentiality shall invite disciplinary action as per the POSH Act.

**Appeal**

Any person aggrieved by the recommendations of the ICC may appeal before the appropriate court or tribunal in accordance with the service rules and the POSH Act.

**Annual Report**

The ICC shall submit an annual report to the District Officer and the employer as required under the POSH Act.

**Awareness Programmes**

The Company shall:

- Conduct regular POSH awareness sessions
- Display posters on consequences of sexual harassment
- Conduct regular training for ICC members

**Protection Against Victimization**

Retaliation against the complainant, witnesses or ICC members is strictly prohibited and shall result in disciplinary action.

**FROG ICC (Internal Complaints Committee) members are:**

<u>Name</u>	<u>Email id</u>
Sonal Trivedi (Chairperson)	<a href="mailto:sonal@frogcellsat.com">sonal@frogcellsat.com</a>
Nidhi Mehra	<a href="mailto:mehranidhi@frogcellsat.com">mehranidhi@frogcellsat.com</a>
Rekha Trivedi	<a href="mailto:rekha@frogserv.com">rekha@frogserv.com</a>
Shrikrishna Nikam	<a href="mailto:shrikrishna@frogserv.com">shrikrishna@frogserv.com</a>
Priya Pandey (NGO Member)	<a href="mailto:priya@miraclefoundation.org">priya@miraclefoundation.org</a>