

POLICY ON PREVENTION AND REDRESSAL OF SEXUAL HARASSMENT [POSH]

OBJECTIVE:

OneAssist Consumer Solutions Private Limited (referred as OA) is committed to providing work environment that ensures every employee is treated with dignity, respect and afforded equitable treatment. We at OA are committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality. OA has zero tolerance for harassment, intimidation or humiliation of a sexual or gender-based nature at the workplace and is dedicated to ensure enactment, observance and adherence of guidelines and best practices that prevent and prosecute act of sexual harassment.

SCOPE:

The scope of this policy extends to below mentioned Employees working for OneAssist Consumer Solutions Pvt. Ltd. (referred as OA) and its subsidiary company Bolttech Device Protection India Pvt. Ltd. (referred as TG)

It covers the following:

1. **Employees:** All individuals employed on a regular, temporary, ad hoc, contractual, daily-wage, or outsourced basis, including those engaged through an agent. It also includes probationers, trainees, and individuals working on a voluntary/unpaid basis.
2. **Workplace & Conduct:** The provisions of this policy apply not only to employees within company premises but also to any location where the company conducts business, whether physical or virtual.
3. **Third-Party Engagement:** Vendors, contractors, consultants, service providers, interns, visitors, clients, and any third parties interacting with employees or present at the workplace are equally covered under this policy.

LEGAL COMPLIANCE:

This policy is intended to provide guidance on the prevention, prohibition, and redressal of sexual harassment at the workplace in line with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and other applicable laws. In the event of any matter not expressly covered under this policy, the provisions of the applicable law shall prevail and be adhered to. Nothing in this policy shall limit or restrict the rights and obligations conferred under the law.

EFFECTIVE DATE:

This Policy will come into effect from 1-April-2026 and supersedes all policies issued earlier.

DEFINITIONS AND EXAMPLES OF SEXUAL HARASSMENT:

In the OA Policy, unless the context otherwise requires, or unless otherwise defined, the following term shall have the following meanings:

1. **Sexual Harassment** - is defined under “The sexual harassment of women at workplace” (Prevention, Prohibition and Redressal) Act, 2013 (“The sexual Harassment Act”) is an act to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment. Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -

- a. Physical contact, including touching, Obscene gestures, indecent exposure, whistling
- b. A demand or request for sexual favors
- c. Making sexually coloured remarks
- d. Showing pornography
- e. Circulating obscene content by email, SMS or MMS
- f. Verbal abuse having sexual overtones
- g. Suggestive comments about a person's appearance, body or clothing
- h. Any physical or computerized display of sexually offensive or explicit material
- i. Unwanted infringement of an individual's personal space, which leads to discomfort
- j. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

When any such act or acts are committed in circumstances where such conduct is humiliating or is likely to constitute a health and safety problem, it will amount to sexual harassment that violates this, Policy. Sexual harassment may occur as single incident or series of incidents. The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment.

- a. Implied or explicit promise of preferential treatment in their employment
- b. Implied or explicit threat of detrimental treatment in their employment
- c. Implied or explicit threat about their present or future employment status
- d. Interference with their work or creating an intimidating or offensive or hostile work environment for them
- e. Humiliating treatment likely to affect health and safety of the employee (Whether male or female)

2. **Workplace** - Includes all company offices and hubs, as well as any location visited by an employee in the course of employment or arising out of work-related duties. It extends to company-related activities or assignments performed at sites away from company premises, and to social, business, or official gatherings such as events, offsites, or functions where conduct or comments may have an impact on the workplace or workplace relations. The definition of workplace further encompasses virtual environments, including emails, official chats, video or teleconferences, and any other digital platforms used for business communication.

3. **Complainant** - An individual who raises the complaint of sexual harassment is the Complainant, thus referring to the associate with the company in a full time/part time capacity as an employee, contractor, client, partner, consultant, vendor, intern, volunteer or visitor.

4. **Respondent** - An individual against whom a complaint of sexual harassment has been received is referred to Respondent, thus referring to the associate with the company in a full time/part time capacity as an employee, contractor, client, partner, consultant, vendor, intern, volunteer or visitor.

INTERNAL COMMITTEE COMPOSITION:

OA Prevention and Redressal of Sexual Harassment Committee - (referred as "OA Internal Committee" (OA IC). The OA IC would be headed by a Senior Female Employee who is on the rolls of any of the business units of OA and would be designated as the "**Presiding Officer**" of the OA IC. Besides the above, an **external nominee**, referred to as **External Committee Member (ECM)** would be appointed as a member of the OA IC. At least 50% of the Committee will be women and Committee will be announced by the Appropriate Authority.

OA IC will conduct an inquiry on any sexual harassment complaint raised by any complainant. If the complaint is against an IC member, then the concerned IC member will not be part of the committee conducting the inquiry.

The company may have multiple Internal Committees constituted to oversee specific administrative units or offices. Term of appointment of each member will hold office for three years only in a committee from the date of appointment. They will be eligible for reappointment in the same or another Committee at the discretion of the Appropriate Authority. Refer the details of the member's part of ICC at each location.

ROLE OF EMPLOYER:

1. Display the POSH policy at conspicuous places in the workplace.
2. Organize regular workshops and awareness programs for employees for sensitization.
3. Provide capability building and orientation programs for IC members.
4. Treat sexual harassment as misconduct under the service rules of the Company.
5. Assist the complainant in filing a police complaint where required under IPC provisions.
6. Monitor timely submission of reports by the ICC.

PROCEDURE AND PROCESS FOR FILING A COMPLAINT:

In the event of occurrence of circumstances under this policy, the aggrieved employee can lodge a complaint to the Internal Committee (IC) by sending an email on posh@oneassist.in within 90 days from the date of the incident. The Internal Committee may, if satisfied that there were valid reasons for the delay, extend this time limit by up to an additional 90 days, as provided under Section 9(1) of the POSH Act, 2013.

If the aggrieved employee is unable to file a complaint due to physical or mental incapacity, death, or any other reason, their legal heir or any other person as prescribed under the law may file the complaint on their behalf.

At the time of filing the complaint, the complainant is required to submit supporting documents, if any, along with the names and addresses of witnesses, if available. The complainant may also file a written complaint with the Appropriate Authority, along with any supporting documents.

The IC is intended to be an independent, objective and unbiased fact-finding body established to investigate any complaints of sexual harassment in a fair, reasonable and time bound manner. On receipt of the complaint, the OA IC would initiate preliminary inquiry to evaluate if there is a prima facie case or not.

1. The internal committee should give very fair and reasonable opportunity to the Complainant and Respondent for putting forward and defending their respective cases and to ensure that the complainant and the respondent have full opportunity to present their claims, witnesses and evidences which may establish and substantiate their claims.
2. Under no circumstances, the committee would reveal / disclose the identity of the “Complainant” and “Respondent” to anyone else (including the immediate manager) - other than all those who are required to know about the case.
3. At the first meeting of internal committee, the complainant shall be heard and if the complainant so requests, the committee may, before initiating an enquiry take steps to resolve the matter between the complainant and the respondent through conciliation; provided there can be no monetary settlement as the basis of conciliation.
4. If a settlement has been arrived at, the IC shall record the same in writing and forward it to the Management of the Company for implementation of the recommended action.
5. Where settlement has been arrived at, no further enquiry needs to be conducted by the IC.
6. If the conciliation fails, or if Complainants or Respondent insist for inquiry, then IC will initiate the inquiry proceedings.
7. Post establishing a prima facie case, the IC will seek explanation in writing from Respondent after providing them the copy of the complaint.
8. The Internal Committee shall complete the inquiry within 90 days from the date of the complaint. The employer shall act on the recommendations of the IC within 60 days of receiving the report.
9. Either the Complainant or the Respondent may prefer an appeal against the recommendations of the Internal Committee within 90 days from the date of receipt of such recommendations, to the Appellate Authority as prescribed under Section 18 of the POSH Act, 2013, or under the applicable service rules of the Company, as the case may be.

ACTION DURING PENDENCY:

1. During the pendency of an enquiry on written complaint made by the complainant, the Internal Committee may recommend to transfer the complainant or the respondent to any other workplace, grant leave or grant work from home option or suspend from service. The granted leave shall be addition to the regular entitlement.

2. Where the respondent is an outsider, during the pendency of the investigation of the complaint and even thereafter, if found guilty, the respondent shall not be allowed to enter the company premises except for the purpose of attending the internal committee proceedings.
3. Suitable action would be initiated against employees who were “in the know”, but did not highlight the same.

CLOSURE OF COMPLAINTS:

Upon completion of the inquiry, the IC shall prepare a written (digital or handwritten) closure report. If the Respondent is found guilty, disciplinary or corrective action will be implemented and documented, and the case shall be considered closed once action is confirmed. If the Respondent is not found guilty, the complaint shall be dismissed, both parties informed in writing, and the case shall be considered closed.

PUNISHMENT FOR SEXUAL HARASSMENT:

If the employee is found to have violated this policy, the management shall act on the recommendations of the IC within 60 days of receiving the report, as may be appropriate for misconduct by the employee under the Company policy. Such action may include any of the following:

1. Written Apology
2. Written warning
3. Change of work assignment/transfer for either the Respondent or Complainant
4. Reprimand or censure, withholding of promotion, pay rise or increments,
5. Termination of employment / Separation from the services
6. undergoing a counselling session which will get decided by the OA IC basis the severity of the misconduct or Past precedence of treating similar violations

In the event Complainant decides to pursue personal action against the Respondent, the Company is obliged to provide all assistance and cooperation in any investigation by the relevant law enforcement agencies. If a Complainant feels that action taken pursuant to the Complaint of sexual harassment does not fully or properly deal with the allegations raised in their complaint, they can bring the same to the notice of the Committee, which would then re-evaluate it accordingly on receipt of such evidences.

PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINTS AND FALSE EVIDENCE:

In the event the IC, after investigation of the complaint in accordance with procedure prescribed herein, concludes that the complaint was false or made with malafide intention by the complainant then the IC shall make such appropriate recommendations to the Company to take action against the Complainant, as may be necessary.

In case the internal committee arrives at a conclusion that during an enquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to take action in accordance with the provisions of the service rules applicable to the said witness.

OTHER GUIDELINES:

1. OA is committed in abiding by the guidelines of this act and will ensure the complete adherence to the defined norms under “The sexual harassment of women at workplace” (Prevention, Prohibition and Redressal) Act, 2013 (“The sexual Harassment Act”).
2. The internal committee shall prepare an annual report and submit it to the District Officer appointed under the Act, in addition to reporting to the management. The annual reports shall include the reports on number of complaints received in the year, number of pending cases more than 90 days, number of workshops or awareness programs conducted.
3. No observation regarding the work and behavior of either the complainant or respondent shall be made which are not related to the alleged act of sexual harassment.
4. If the complainant or the respondent fails to be present for three (3) consecutive hearings without giving a sufficient cause, the IC will give a notice in writing of fifteen (15) days in advance to the concerned parties before terminating the enquiry proceedings or giving an ex-parte decision on the compliant.
5. The Complainant, the Respondent or any other persons that the internal committee meets with, interacts with, or has teleconference or video conference with, for the purpose of enquiry into any complaint of sexual harassment shall be bound by strict confidentiality and each such party shall not be permitted to discuss the internal committee proceedings with any third person.
6. No party shall be allowed to bring in any legal practitioner or guardian or similar to represent them in their case at any stage of the proceedings before the OA IC.
7. Records and documents on proceedings of OA IC will be stored securely and confidentially for a minimum of five years from the date of commencement of the complaint, irrespective of the fact, whether the Complainant or Respondent are in the job or have moved on from the organization.
8. Company will conduct awareness programs and create forums for dialogue to sensitize all employees about the provisions of the Act. Spread awareness of the policy amongst its employees by publication, notification and circulation of the policy.
9. We are committed to giving every employee a fair hearing on issues that are raised on complaints of Sexual Harassment. The Company shall ensure protection against retaliation or victimization of complainants, witnesses, and Internal Committee members. Any retaliation shall be treated as misconduct and will attract disciplinary action.
10. If an individual commits an act of violation of this policy, whether an employee of the company or a third party interacting with the company, the company will take appropriate measures under the circumstances, including measures to mitigate the potential for repetition of such act.
11. With regard to disciplinary actions against Respondent who is not on rolls of OA but is on the rolls of a business partner or a client or a vendor or a consultant and has been accused by Complainant and subsequently found guilty, the OA ICC would direct the CHRO/Head HR to officially instruct the concerned business partner or client or vendor or the consultant or the organization / institution to which Respondent belongs (as the case maybe) to implement the recommendations of OA ICC. In case of non-implementation of recommendations of OA IC as mentioned above, then OA ICC will direct the Head HR to initiate action against the Respondent under the Indian Penal Code or any other law at the time being in force.

VALIDITY:

Management reserves the right to make any changes to the policy at any time. In the event of an exceptional circumstance in a business exigency, or when in doubt on the interpretation of the policy, the decision of Management would be final and abiding.

POLICY VERSION:

Amendment Date	Version	Author	Prepared By	Approved By
24-Jan-2023	1.0	HR	Nimish Pradhan	Mahesh Kulkarni
02-Nov-2023	2.0	HR	Nimish Pradhan	Bhanu Chawla Group HR Head
25-Nov-2024	3.0	HR	Divya Seth AVP-HR	Bhanu Chawla Group HR Head
01-Oct-2025	4.0	HR	Divya Seth AVP-HR	Bhanu Chawla CHRO
01-Apr-2026	5.0	HR	Divya Seth AVP-HR	Bhanu Chawla CHRO

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