

Meganet Technologies Global Limited
(formerly known as Mega Networks Private Limited)

**POLICY FOR PREVENTION OF SEXUAL
HARASSMENT (POSH)**

Adopted by the Board of Directors of the Company in its meeting held on December 20, 2024

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

Meganet Technologies Global Limited (formerly known as Mega Networks Private Limited) (“the Company”) is committed to providing a safe and respectful work environment to its employees that enables employees to work without fear of prejudice, harassment or any forms of intimidation or exploitation. The company also believes that all employees have the right to be treated with dignity.

The Company does not support discrimination of individuals on the basis of race, colour, gender, age, national origin, religion, sexual orientation, marital status, citizenship and disability.

Sexual harassment at Workplace is strictly prohibited. Sexual harassment to any employee results in violation of the fundamental rights of an employee to equality under articles of the Constitution of India and his / her right to life and to live with dignity and the right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

The objective of this Policy is to provide protection against sexual harassment, or any other form of harassment based on gender, race, religion, natural origin, age, sexual orientation, or other protected classification at workplace and for the prevention and redressal of complaints of harassment and for matters connected therewith.

Scope

This Policy will be applicable to all the employees of the Company including those employed on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor. Policy also extends to those who are not employees of the Company, such as customers, visitors, vendors, suppliers, trainee or called by any other name, who practice or indulge in any kind of harassment within the Premises of the Company.

The workplace includes

1. All offices, factories, or other premises where the Company’s business is conducted.
2. All company-related activities performed at any other site away from the Company’s premises.
3. Any social, business, or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Definitions

- **“Act”** means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as amended and any other rules framed pursuant to the same;
- **“Aggrieved/Complainant”** means in relation to a workplace, any individual of any age whether employed in the Company or not, who alleges to have been subjected to any act of harassment by any Respondent and includes contractual/temporary agents and visitors;
- **“Company”** means Meganet Technologies Global Limited (formerly known as Mega Networks Private Limited);

- **“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;
- **“Internal Committee”** means and include an Internal Complaints Committee (hereinafter referred to as the “ICC”);
- **“Local Committee”** means the local complaints committee constituted under section 6;
- **“Member”** means a member of the Internal Committee;
- **“Parties”** means collectively the complainant and the respondent;
- **“Presiding Officer”** means the presiding officer of the Committee and shall be a woman employed at a senior level at the Workplace amongst the Employees.
- **“Respondent”** means a person against whom the Aggrieved has made a complaint.

Guidelines

Sexual Harassment shall include but not limit to:

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

Which interferes with another employee’s job performance or creates the workplace atmosphere, which is intimidating, hostile, offensive or humiliating. In other words, among other circumstances, if it occurs or is present in relation to or connected with any of these acts like interference with her work or creating an intimidating or offensive or hostile work environment for his / her or humiliating treatment likely to affect her health or safety will amount to sexual harassment.

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

- a. Implied or explicit promise of preferential treatment in employment; or
- b. Implied or explicit threat of detrimental treatment in employment; or
- c. Implied or explicit threat about the present or future employment status; or
- d. Interference with work or creating an intimidating or offensive or hostile work environment for the person; or
- e. Humiliating treatment affecting any person’s health or safety.

If You Are Harassed:

If you believe you have been subjected to or witnessed sexual harassment committed by anyone, including visitors or other non-employees, you should:

- Tell the offender that his behaviour is unwelcome and ask him to stop immediately.
- Keep a record of incident/s (dates, times, locations, possible witnesses, what happened, your response). It is helpful and necessary to have a record of events, since such records can strengthen your case and help you remember the details over time.

While submitting your written complaint it is necessary to have all details and evidence attached to the complaint.

- If, after telling the offender to stop his behaviour, the sexual harassment continues, report the abuse to your reporting Manager. If the respondent is your reporting manager, then report to the HR Department. Sexual harassment complaint can also be addressed to the Internal Committee member constituted to address sexual harassment complaints. If you desire you may forward the complaint through email to HR, which will reach our Internal Committee.

Such a complaint should be made in writing and within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. Once the Aggrieved Woman makes a complaint it is necessary for the complainant to keep the information about the complaint strictly confidential.

The Internal Complaints Committee (ICC)

For the purpose of handling and addressing any of the complaints under sexual harassment an Internal Committee has been formed. The Committee has been constituted with the following members as nominated by the Company:

- a. Presiding Officer: A woman employed at a senior level in the organization or workplace
- b. At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge
- c. One external member, familiar with the issues relating to sexual harassment
- d. At least one half of the total members is women

The Chairperson and every Member of the Internal Committee shall hold office for such a period, not exceeding three years, from the date of their nomination as may be specified by the Company under the Policy. The Presiding Officer and the members of the internal committee shall comply with the duties and obligations as set out in the Act.

In case of any non-compliance, the Chairperson or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of this section. Further, in following instances, the Chairperson or Member can be removed:

- (a) has contravened the provisions of section 16; or
- (b) has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him; or
- (c) he has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or
- (d) has so abused his/her position as to render his continuance in office prejudicial to the public interest.

The Member appointed from amongst the non-governmental organizations or associations shall be entitled to get paid such fees or allowances for holding the proceedings of the Internal Committee, by the Company.

The Committee shall be responsible for:

- a. Receiving complaints of harassment at the workplace.
- b. Initiating and conducting inquiry as per the established procedure.
- c. Submitting findings and recommendations of inquiries.

- d. Coordinating with the employer in implementing appropriate action.
- e. Maintaining strict confidentiality throughout the process as per established guidelines.
- f. Submitting annual reports in the prescribed format.

Complaint Redressal Mechanism

1. Complaints received will be addressed as per the process laid down in this policy. Consistent with the Company's obligation to conduct an investigation and take appropriate corrective action, complaint of sexual harassment will be treated immediately and fairly.
2. It is the obligation of all employees to report Sexual Harassment faced by them in writing and with all relevant records within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.
However, where such complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the woman for making the complaint in writing
Further, the Internal Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.
3. Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this Policy.
4. Once the complaint is received, it will be kept strictly confidential and will be dealt with confidentiality. The person accused (respondent) will be informed that a complaint has been filed against him and no unfair acts of retaliation or unethical action will be tolerated. The Committee will maintain a register to endorse the complaint received by it.
5. The Internal Committee before initiating an inquiry and at the request of the aggrieved, take steps to settle the matter between aggrieved and the respondent through conciliation, provided no monetary settlement shall be made as a basis of conciliation. Where there is a settlement arrived, Internal Committee will record the statement and forward the same to HR, copies of which will be given to the Aggrieved and the respondent. If no conciliation is arrived at, the Internal Committee shall ensure that a fair and just inquiry is undertaken immediately.
6. Both the complainant and the alleged respondent initially will be questioned separately with a view to ascertain the veracity of their contentions. At the first meeting, the Members shall hear the complainant and record her/his allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady Employees involved and a male officer for male Employees, involved shall meet and record the statement.
7. The Internal Committee shall have the same power as that of a civil court and can:
 - Summon and enforce the attendance of any person and examine him / her on oath;

- Ask for discovery or production of document;
 - The Internal Committee shall, where the respondent is an employee, proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable to the respondent. In addition, the Internal Committee shall if the aggrieved so desires and if prima facie case exists, assist and forward the complaint to the police, for registering the case within a period of seven days, under section 509 of the Indian Penal Code;
 - If the aggrieved informs the Internal Committee, that any term of condition of the settlement arrived has not been complied with by the respondent, the Internal Committee shall proceed to make an inquiry into the complaint including forward the complaint to the police as the case may be.
8. During the pendency of an inquiry on a written request made by aggrieved the Internal Committee in its sole discretion may recommend to the employer the following:
 - Transfer the aggrieved or the respondent to any other workplace or department; or
 - Grant leave to the aggrieved up to a period of three months; or
 - Grant such other relief to the aggrieved woman as may be prescribed.
 9. The Internal Committee shall complete the inquiry within ninety days. The Internal Committee on completing the inquiry will make a detailed report within 10 days of completing the inquiry and submit to the Chairman of the Audit Committee, the Management of the Company, the Legal and HR Department on the following:
 - Background
 - Documented testimony of the complainant and the respondent
 - Evidences gathered / recorded
 - Findings of the Inquiry
 - Recommended action
 10. The Independent Investigation Committee, if after completing an inquiry arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to Hearing Committee and remaining members of ICC that no action is to be taken in the matter.
 11. If the ICC arrives at the conclusion that the allegations against the respondent have been proved it shall recommend to the employer, Hearing Committee and remaining members of ICC to take action for sexual harassment as misconduct in accordance with the provisions of the service rules applicable to the respondent including dismissal or where no such service rules have been made, in such manner as may be prescribed. Further, it shall be recommended to Hearing Committee and remaining members of ICC to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine.
 12. Upon receipt of the report, management of the Company will review the report and determine what action and follow – up needs to happen within 60 days of the receipt of report by the employer.
 13. The complainant and the respondent shall be informed of the outcome of the investigation. If the investigation reveals that the complainant has been sexually harassed as claimed, the respondent will be disciplined accordingly as prescribed by law.

14. Notwithstanding anything contained in the Right to Information Act 2005, the contents of the complaint made, identity, addresses of the aggrieved, respondent and witnesses, any information relating to conciliation and inquiry proceeding, recommendations of the Internal Committee shall not be published, communicated or made known to the public, press or media in any manner.

15. Enquiry under this policy will be held at the location of the complaint.

False or Malicious Complaint

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on inquiry by the ICC it is revealed and concluded that the complaint was made with a malicious intent or the aggrieved or any other person making the complaint has made the complaint knowing it to be false, forged or misleading, or false document submission and with the motive of maligning the concerned individual / tarnishing his / her image in the company and to settle personal / professional scores, it may recommend to the employer to take action against the woman or the complainant in accordance with the provisions of the service rules applicable to the said witness.

In case during the inquiry mere inability to substantiate a complaint or provide adequate proof may not attract action against the complainant.

The malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

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

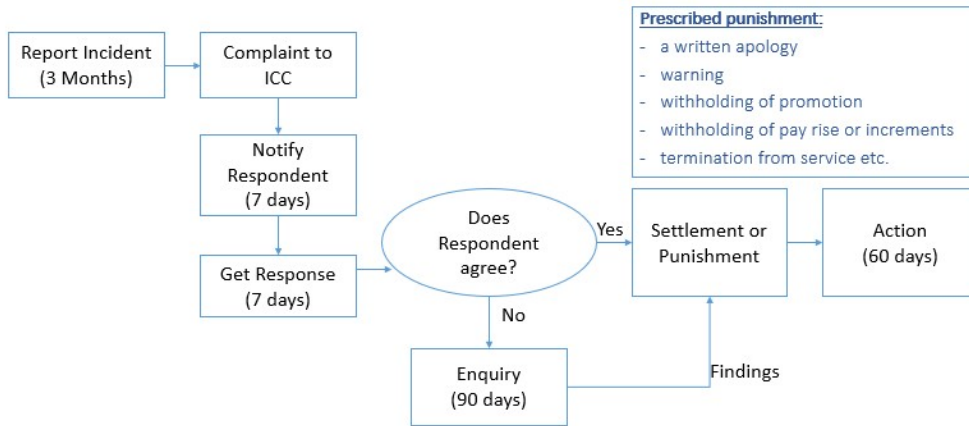
Protection Against Non-Retaliation

The Company prohibits retaliation of any sort regardless of the outcome of the complaint against a person who has reported a concern, brought a complaint, cooperated in the inquiry of a complaint, or because a person is closely associated with an individual who has raised a complaint.

The organisation while dealing with complaints of sexual harassment shall ensure that the complainant or the witness are not victimized or discriminated against by the respondent. The complainant should report any unwarranted pressures, retaliatory or any other type of unethical behaviour from the respondent while the investigation is in progress to the ICC as soon as possible. If the complaint made is found to be genuine, ICC will take disciplinary action against the respondent.

Process:

Process of filing a Complaint with ICC:



Appeal

Any person aggrieved by the recommendation of Committee may prefer an appeal under the relevant provisions of the Act and rules applicable thereunder.

Adopted on

This Policy was adopted by the Board of Directors of the Company in its meeting held on December 20, 2024.

Amendments

This Policy shall be reviewed periodically by the Board and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. However, all such amendments are subject to applicable laws, rules and regulations to the Company, from time to time.

Complaint Form

1. Details of Aggrieved Individual:

Name	Designation	Division and Department	Contact No

2. Details of Complainant (In case of Complainant is not the Aggrieved Individual)

Name	Relationship with Aggrieved Individual	Contact No	Address

3. Detail of individual alleged to have engaged in sexual harassment

Name	Designation	Division and Department	Contact Number

4. Details of the incident(s)

S. No	Description of Incident	Date & time of Incident	Place of Incident	Name and Contact details of Witness

5. Has a report regarding these incidents been filed with any other agency

Yes () No ()

If yes, with whom?	
Additional Information and Comments, if any	
X Signature of Aggrieved Individual	Date:
X Signature of the Complainant	Date: