

# Leanworx Technologies Pvt. Ltd.

## POSH Policy

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# Prevention of Sexual Harassment Policy (POSH)

## Purpose

Leanworx believes in creating a workplace where all employees can work free of any fear of prejudice, unfair treatment or bias whether based on gender or otherwise. The Company will not tolerate or condone Sexual Harassment (as defined hereinafter) at the Workplace (as defined hereinafter), as it is a violation of a person's fundamental rights to life, equality, their right to live with dignity, and to practice any profession or to carry on any occupation, trade, or business, which includes the right to a safe environment free from Sexual Harassment. It creates an unhealthy and unproductive atmosphere at the Workplace.

The Company expects its employees to always behave in a dignified and respectful manner at the Workplace. The objective of this Policy on Prevention of Sexual Harassment ("Policy") is to provide protection against Sexual Harassment at Workplace and for the redressal of complaints of Sexual Harassment and for matters connected therewith.

The Company has zero-tolerance for Sexual Harassment. The Company values each employee working with it and wishes to protect their dignity and self-respect. In doing so, the Company is determined to promote a working environment in which people of any gender complement each other as equals in an environment that encourages maximum productivity and to keep personal dignity.

The Company is committed towards giving every employee a just and fair hearing on issues encountered by them at the Workplace with special attention to Sexual Harassment. The Company will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint. Sexual Harassment at the Workplace will be considered a grave offence, and the Company is committed to take all necessary action to ensure that its employees are not subjected to any form of harassment.

## Scope

This Policy has been drafted keeping in mind the basic tenets of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and any amendments made thereto, read with the rules framed thereunder. This Policy will apply to all the Employees (as defined hereinafter) at the Workplace.

This Policy covers all forms of alleged acts of sexual harassment, as described under the POSH Act of women by men, of men by women or between the same sexes. Sexual harassment is unlawful irrespective of who is involved in such behavior.

"Annexure A" of this Policy provides an indicative list of examples of behavior which may be found to constitute Sexual Harassment in the Workplace.

“Annexure B” of this Policy provides the details of the Internal Complaints Committee of the Company. The members of the Internal Complaints Committee shall be appointed for a period of 3 (Three) years from the date of their appointment. Upon completion of the tenure of a member, the Internal Complaints Committee shall be reconstituted by the Company.

## Objective

Loanword is committed to create a safe work environment that is free from any form of sexual harassment and where all employees are treated with dignity and respect. Leanworx is dedicated to maintaining an environment which is free from coercion and intimidation.

Leanworx has adopted certain procedures and guidelines to govern cases against sexual harassment. The procedure has been provided below in Loanword’s policy against sexual harassment (“Policy”).

All allegations of sexual harassment shall be taken seriously by Leanworx and shall be governed by this Policy.

This Policy extends to all employees of Leanworx and is deemed to be incorporated into the service conditions of all employees and comes into effect immediately.

Leanworx is implementing a Gender-Neutral policy.

## Definition

Any behavior (physical, verbal, written, graphic, electronic, emotional, psychological, or through gestures that offend) which has been defined as inappropriate by the Policy, whether intentional or not, which offends the dignity of the person towards whom the behavior is directed by fellow employee(s), supervisor(s), customer(s), or supplier(s) will be considered sexual harassment and shall invite serious disciplinary action.

Sexual harassment would mean and include (whether direct or by implication) any of the following:

- 1. Unwelcome sexual advances**  
Requests or demands for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination, or evaluation of a person towards any activity.
- 2. Advances involving verbal, non-verbal, or physical conduct**  
Includes sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, indecent exposure, physical contact, sounds, display of pictures, intrusive questions about a person’s private life or body, signs, insults, or taunts based on sex, obscene communication, verbal, or non-verbal communication that offends the individual’s sensibilities and affects her/his performance.
- 3. Eve teasing, innuendos, and taunts**  
Unwelcome invitations to go out, suggestive comments or jokes, physical confinement against one’s will, and likely intrusion upon one’s privacy.
- 4. Act or conduct by a person in authority**  
Creates a hostile or intimidating environment at the workplace towards a person of the opposite sex.
- 5. Conduct of such an act at the workplace or outside**  
In relation to an employee during employment.
- 6. Any unwelcome gesture by an employee having sexual overtones**

- Includes physical contact and advances.
7. **A demand or request for sexual favors**  
Staring, leering, or unwelcome touching.
  8. **Suggestive comments or jokes**  
Sexually colored remarks; showing pornography.
  9. **Unwelcome sexual activity tied to employment decisions or benefits**  
Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

## **Applicability**

This policy applies to:

1. All employees of Leanworx (including employees on contract or on third-party rolls).
2. All customers, suppliers, and contractors of Leanworx.
3. All third parties associated with Leanworx at work or involved in work-related activities.
4. The complainant as well as the respondent, who may be a man or a woman.
5. The complainant need not be of the opposite sex.
6. The respondent can be anyone, including the complainant's supervisor, agent, contractor, customer, client, or any other employee of Leanworx.
7. The complainant does not have to be the person harassed but could be anyone affected by the offensive conduct.
8. It may occur without economic injury to the complainant.
9. It may occur at the workplace or any other place where the employee is engaged in work-related activities.
10. It may occur with Leanworx employees deputed to client sites.

## **Internal Committee (IC) formation**

Complaints of sexual harassment shall be dealt with by the Internal Committee (IC).

1. Annexure B of the Policy provides for the constituent members of the IC.
2. The IC should comprise a Presiding Officer (compulsorily a woman), and not less than half of its members should be women.
3. External member, as mandated by law.

## **Redressal procedure and mechanism**

1. Complaints must be made by the complainant to any IC member within 3 months from the date of the incident. The IC, if reasonable, may further extend the time for making a complaint to a further 3 months.
2. Complaints can be made in person, via phone, email, or letter to the Presiding Officer or any committee member. Any oral communication should be followed up with written communication.
3. If an employee is working outside the Leanworx office, i.e., at a client location, they may also lodge a complaint with the committee members.
4. In case it is found that any employee has lodged a false complaint, the IC can act against such a person after the inquiry.
5. Every employee who threatens or intimidates any person who has made a complaint under this policy or any witness thereof shall be liable for disciplinary actions as per the rules of Leanworx.

## **Lodging a complaint**

1. The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any committee member at the workplace.
2. The complaint must be lodged within 3 months from the date of the incident/last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing if satisfied that these reasons prevented lodging the complaint.
3. If the complaint cannot be made in writing, the Presiding Officer or any IC member shall render all reasonable assistance for making the complaint in writing.

## **Conciliation and informal complaint redressal procedure**

1. The IC shall meet within 3 days of filing the complaint to examine it.
2. At the request of the complainant, IC shall settle the matter between the complainant and the respondent/accused through conciliation.
3. Conciliation should not include any monetary settlement.
4. Upon conciliatory settlement, no further inquiry shall be conducted by the IC.

## **Relief to complainant during pendency of inquiry**

During the pendency of the inquiry, upon request by the complainant, the IC may:

1. Allow the complainant to work from home for up to 3 months.
2. Grant leaves to the complainant for up to 3 months, over and above the official leave.
3. Restrain the respondent from reporting on the work performance or supervising any academic activity or evaluation of the complainant.

The Organization shall decide upon the IC's recommendations within 7 days.

## **Formal complaint redressal procedure and manner of inquiry**

1. Upon receiving a complaint, the IC shall interview both parties within 2 working days and record findings.
2. A minimum of 4 IC members, including the Chairperson and an external member, shall be present during the inquiry.
3. The IC shall provide a report of its findings to the Organization within 10 days from the completion of the inquiry.
4. If the IC concludes that the allegation is true, it shall recommend actions such as deduction from the respondent's salary to compensate for the aggrieved or disciplinary actions as appropriate.
5. Disciplinary actions may include a letter of warning, written apology, withholding of promotion, pay rise, increments, or dismissal.

## **Disciplinary actions and compensation**

The IC may recommend compensation based on:

1. Mental trauma, pain, and suffering caused to the aggrieved.
2. Loss of career opportunity due to sexual harassment.
3. Medical expenses incurred for physical or psychiatric treatment.
4. Income and financial status of the respondent.

## **Malicious allegations**

If the IC finds that the allegation against the respondent is malicious, it may recommend action against the complainant like that for substantiated complaints.

## **Appeal**

Any dissatisfied party may appeal to the appellate authority within 90 days of the recommendations being communicated.

## **Confidentiality**

All involved in the complaint process must maintain confidentiality. Any breach will lead to disciplinary actions as per Leanworx's rules.

## **Training and workshops**

The IC members shall undergo compulsory training against workplace sexual harassment, covering topics like gender sensitization, procedural intricacies, case studies, and complaint mechanisms.

## **Duties of the employer**

1. Provide a safe working environment.
2. Display penal consequences of sexual harassment.
3. Organize workshops and training programs.
4. Provide necessary facilities for dealing with complaints and conducting inquiries.

## **Duties of the employee**

1. Abstain from acts amounting to sexual harassment.
2. Report incidents without fear.

## **Duties of the IC**

1. Conduct inquiries as per the procedures outlined.
2. Maintain confidentiality and prepare an annual report.
3. Ensure fair and unbiased handling of complaints.

## Preparation of report

The IC shall prepare an annual report summarizing:

1. Number of cases received, disposed of, and pending.
2. Workshops and awareness programs are conducted.
3. Actions taken by the Executive Committee or the employer

## Evaluation of policy

1. The Sexual Harassment Policy shall be evaluated so that any amendments required may be recommended by the redressal committee based on their experience of dealing with complaints.
2. The exercise shall be an annual exercise at the minimum. The Policy will be flexible to amendments to address situations that the policy has not covered at the onset.

## ANNEXURE A

### Some examples of sexual harassment at the workplace

#### A. Visual Conduct:

- Leering
- Making sexual gestures
- Displaying sexually suggestive or explicit objects, pictures (still or moving), cartoons, graffiti, or posters in any manner, including as part of e-mail transmissions

#### B. Verbal Conduct:

- Whistling and catcalls
- Foul or obscene language
- Making or using derogatory comments which are sexual in nature
- Explicit discussions about sexual activities/behaviors
- Comments about a person's physical attributes
- Spreading rumors about another person's sexual activities/conduct and/or partners
- Jokes which contain offensive, obscene, or lascivious content
- Sexual advances / Sexual propositions
- Sexual suggestions or double meaning words

#### C. Written Conduct:

- Suggestive, obscene, or propositioning letters, notes, greeting cards or invitations, including but not limited to those transmitted via e-mail
- Displaying pictures (still or moving), cartoons, graffiti, or posters in writing, including but not limited to e-mail

D. Physical Conduct:

- Unwelcome touching
- Sexual assault
- Kissing / Hugging / Grabbing
- Coercing another person to participate in sexual intercourse or other sexual behaviors
- Impeding or blocking movements
- Any physical interference with normal work or movement
- Sexual gestures

**ANNEXURE B**

Constituent members of the Internal Committee

Position	Name	Designation	Email	Phone number
Presiding Officer	Shreeja HV	Sr. Developer	shreeja@leanworxcloud.com	8971040621
Member 1	Dasarathi GV	CEO	das@leanworxcloud.com	9845858188
Member 2	Shyamraj Sathish	Manager - Development	shyamraj@leanworxcloud.com	9731102868
External Member	Brinda Adige	Director - Global Concerns India <a href="https://www.globalconcernsindia.org/">https://www.globalconcernsindia.org/</a>	brindaadige@gmail.com	9845518138