

Prevention of Sexual Harassment (PoSH) Ensuring a Safe, Respectful, and Inclusive Workplace for All

This policy reflects our culture of fairness, safety, and accountability. A respectful workplace is everyone’s right — and everyone’s responsibility.

“At Scrobites, we don’t just protect rights — we promote respect.”

Policy Information	
Policy Title	Prevention of Sexual Harassment at Workplace
Updated by	HR Department
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Approver	Management

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1. Introduction

Scrob1TS is committed to providing a safe, respectful, and inclusive work environment for all individuals, irrespective of gender, identity, role, or designation. This policy is aligned with The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 ("the Act") and applies to every individual associated with Scrob1TS.

We maintain **zero tolerance** toward any form of sexual harassment and are committed to addressing all concerns with fairness, dignity, and due process.

2. Objective

- Ensure the workplace is free from any form of sexual harassment.
- Provide a redressal mechanism that is confidential, time-bound, and legally compliant.
- Uphold the rights of all individuals and foster a culture of dignity and respect.

3. Scope and Applicability

This policy applies to:

- All Scrob1TS employees, interns, freelancers, consultants, and contract workers.
- Vendors, clients, and any third-party individuals associated with the company.
- All workplace settings: office premises, off-site locations, work-from-home, virtual meetings, and social media or digital platforms where individuals interact or communicate in the course of a working relationship, as well as any professional environment linked to Scrob1TS.

4. Definitions

- **Sexual Harassment:** Includes unwelcome acts — verbal, non-verbal, physical, written, visual, or digital — that may offend, humiliate, or intimidate an individual.
- **Aggrieved Person:** Any person (irrespective of gender) who alleges sexual harassment.
- **Respondent:** The individual against whom the complaint is made.
- **Workplace:** Physical or virtual spaces where interactions occur due to working relations.
- **Employer:** The leadership team or their authorised representatives.

5. Internal Committee (IC)

Scrob1TS has constituted a legally compliant Internal Committee:

- **Presiding Officer:** A senior woman employee.
- **Two Internal Members:** Employees with legal/social awareness.
- **One External Member:** From an NGO or with POSH/social work/legal expertise.
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At least 50% of IC members will be women.

6. Responsibilities of the Employer

- Maintain a safe, harassment-free work environment.
- Constitute and train the IC.
- Display policy details at prominent locations and HRMS.
- File annual returns to the District Officer.
- Conduct regular PoSH awareness and training sessions.

7. Complaint Redressal Mechanism

A. Filing a Complaint

- To be filed within 3 months of the incident (extendable by another 3 months).
- Complaints can be made in writing, through email or through HRMS.
- Support will be provided to record verbal complaints.
- The complaint should have complete details of the incident / incidents like date, time, location, incident brief, name of the respondent / respondents, names of witnesses (if any), evidences (if any) any other details relevant to the incident, like underlying factors.

B. Conciliation (Optional)

- May be initiated at the request of the aggrieved person.
- No monetary settlement allowed.

C. Formal Inquiry Process

- Complaint forwarded to respondent within 7 days.
- Response to be submitted by the respondent within 10 working days.
- The Internal Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for three consecutive hearings convened by the Presiding Officer. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- The Complainant and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the internal committee.
- During the course of inquiry, the Complainant and the Respondent shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Internal Committee.
- Inquiry completed within 90 days.
- IC report submitted within 10 days of completion.
- Employer must act on the recommendations by Internal Committee within 60 days.

8. Interim Relief During Inquiry

On request, IC may recommend:

- Work Mode change of either party
- Leave (up to 3 months)
- Restrictions on interactions
- Change of work location
- Change in project/department
- Change in reporting structure
- Any other preventive relief

9. Disciplinary Actions (If Complaint Is Substantiated)

- Written apology
- Warning or reprimand
- Appraisal hold or demotion
- Withholding of pay raise
- Suspension or termination
- Deduction from salary as compensation

10. False or Malicious Complaints

If a complaint is found to be false with malicious intent, the IC may recommend appropriate action against the complainant. However, inability to prove a claim does not imply malice.

11. Confidentiality

All records, identities, and proceedings are confidential. Breach of confidentiality will attract disciplinary and legal consequences. Any person who becomes aware of such an incident is required to maintain strict confidentiality and disclose information only to the Internal Committee.

The complainant and respondent are advised not to use external or third-party tools, including AI-based platforms, for drafting complaints or responses, as this may result in unintended disclosure of sensitive information and constitute a breach of confidentiality.

Retaliation: Any form of retaliation—such as isolation, giving the cold shoulder, creating obstacles at work, or exclusion—against a person who has filed a complaint of sexual harassment, a witness to such conduct, or an individual accused of sexual harassment, is strictly prohibited and punishable under the Act.

12. Appeals

Either party may appeal against the IC's recommendation or the employer's action within 90 days of implementation of recommendations.

13. Timelines Summary

Step	Timeline
Complaint Filing	Within 3 months (extendable)
Complaint Sent to Respondent	Within 7 days
Respondent Reply	Within 10 working days
Inquiry Completion	Within 90 days
IC Report Submission	Within 10 days post inquiry
Employer Action	Within 60 days
Appeal	Within 90 days

14. Annual Report

- Number of complaints received
- Number of cases resolved
- Actions taken
- Awareness and training sessions conducted
- The Annual Report needs to be submitted at the end of the year with the above details to the District Office. The Annual Report needs to be signed by the Presiding Officer.

15. Awareness and Training

(Prevention begins with recognition; therefore, awareness is pivotal.)

- The PoSH Policy will be shared with all employees via email and the HRMS platform.
- Mandatory annual PoSH awareness training will be conducted for all employees.
- Specialized training will be provided to IC members, covering legal and ethical aspects of the PoSH Act, standard operating procedures (SOPs), and the psychological considerations essential for conducting fair investigations and implementing preventive measures.

16. Workplace Relationships & Professional Conduct

Scrobites acknowledges that consensual relationships may develop in the workplace. However, any relationship must not:

- Affect team dynamics or professional objectivity
- Lead to perceived favoritism or bias
- Create discomfort for third-party observers
- Involve power imbalance (e.g., between manager and reportee)

Employees involved in such relationships are expected to:

- Maintain professionalism at all times
- Disclose to HR if there's a direct reporting relationship
- Respect co-workers' comfort and environment

If any other employee feels uncomfortable due to visible dynamics of such a relationship, they are encouraged to raise concerns confidentially with the IC or HR.



ANNEXURE A

In case of sexual harassment at the workplace, do not suffer in silence. Immediately, reach out to the Internal Committee.

The Internal Committee has been constituted in adherence to the provisions of “The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Please note the Internal Committee details below:

Sr. No.	Position in Committee	Employee Name	Mobile Number	Email ID
1	Presiding Member	Rutuja Karpe	7262969699	rutuja.karpe@scrobites.com
2	Internal Member	Ashish Kawale	8605553254	ashish.kawale@scrobites.com
3	Internal Member	Bhuwan Purohit	7062388546	bhuwan.purohit@scrobites.com
4	External Member	Aparna <u>Gonate</u>	9082553075	aparna.gonate@gmail.com

Know Your Rights

Scrobites Technologies LLP is committed to providing a safe, secure, and respectful workplace for all employees. Any act of sexual harassment at the workplace is strictly prohibited and will be addressed promptly and confidentially.

External Support & Helplines

Women’s Helpline (Toll-Free): 181

Emergency Helpline: 112

SHe-Box Portal: <https://shebox.wcd.gov.in/>

Nodal Officer: Bhuwan Purohit

A Safe Workplace is Everyone’s Responsibility