

# CORPORATE POLICIES

**Section 1 - Code of business conduct**

**Section 2 - Corporate business principles**

**Section 3 - Corporate social responsibility**

**Section 4 - Policy on Prevention of Sexual Harassment(PoSH) at workplace**

# CODE OF BUSINESS CONDUCT

## SECTION 1

Issuing Dept : Risk & Compliance

Target Audience: All Employees

Approver : Board of directors

Date Approved : Sept 2024

# CODE OF BUSINESS CONDUCT

The **Leafinov Technologies Pvt Ltd** (Hereinafter referred as Leafinov or Organization or Company and its subsidiaries) code of conduct (a.k.a COBC) herein has been adopted by board of directors of the company and by all its subsidiaries.

References in various sections of the code of conduct to:

“Employees” shall include “senior management” being the members of core management team of the company excluding the Board of directors and normally comprising of all members of management one level below the executive directors, including all functional heads

“Executive board” shall be referred as “Management committee”

The code of conduct shall apply to the directors and duties as laid down by Indian companies act.

The directors and the senior management shall affirm the compliance of the COBC on an annual basis and mentioning in company annual report

Affirmation of compliance of the code may also be taken from other employees as may be considered necessary by the CEO/Managing director

The CEO/MD may issue clarification/guidelines on any aspects of company COBC with respect to its adoption

## Vigil Mechanism:

Directors and Employees can report concerns about unethical behaviour, actual or suspected fraud or violation of this COBC on a confidential basis outside the line manager structure. The company prohibits retaliation on any employee or director for such reports made in good faith, while it also protects the rights of the incriminated person.

All COBC incidents can be reported using internal employee portal or email to a separate email ID owned by company secretary, message to COBC helpline number.

# CODE OF BUSINESS CONDUCT- TOPICS

Section I: Compliance with law

Section II: Conflict of Interest

Section III: Outside directorship & other outside activities

Section IV: Family & relatives

Section V: Corporate opportunities

Section VI: Insider trading

Section VII: Antitrust and fair dealing

Section VIII: Confidential Information

Section IX: Fraud, protection of company assets

Accounting

Section X: Bribery and corruption

Section XI: Gifts, meals, entertainment

Section XII: Discrimination & harassment

Section XIII: Failure to comply

Section XIV: Reporting illegal or non-complaint

# SECTION I - COMPLIANCE WITH LAW

## We respect the law at all times:

Leafinov and team bound by the law, compliance with all applicable laws and regulations must never be compromised

Additionally, employees shall adhere to internal rules and regulations as they apply in a given situation, those internal rules are specific to company rules and may go beyond what is required by law.

# SECTION II - CONFLICTS OF INTEREST

## We will always act in the best interest of organization and its subsidiaries:

A conflict of interest occurs when personal interests of an employee or the interests of a third-party compete with the interest of Leafinov and its subsidiaries, In such a situation, it may be difficult for employee to act fully in the best interest of the company.

Employees shall avoid conflicts of interest whenever possible.

If a conflict of interest has occurred or if an employee faces a situation that may involve or lead to a conflict of interest, the employee shall disclose it to his/her line manager, HR, finance or legal representative to resolve the situation in a fair and transparent manner.

# SECTION III - OUTSIDE DIRECTORSHIP & ACTIVITIES

## We take pride in our company reputation and consider company best interests also in our outside engagements and activities:

Outside of the company and its subsidiaries, no activities shall be pursued if such activities will interfere with the employees responsibility of the company or if they create risk for company reputation or if they in any other way conflict with the interest of the company.

When in doubt about the permissibility of an activities, employees shall consult with the HR or legal or compliance function.

The following positions and the activities are deemed acceptable only in case of prior authorization from a member of the executive board

- Board member/ Officers/Employees/ Partner/ Consulting

Authorization will be withheld if the position or activity is likely to conflict with company interest or the employees responsibilities

Board membership on public listed companies need prior approval by the CEO and in the case of members of the executive board chairman Unless requested by the company to take up a particular position or activity, employees shall pursue outside activities and positions at there own risk and cost and within their spare time only.

# SECTION IV: FAMILIES & RELATIVES

## Our hiring and people development decisions will be fair and objective

Immediate family members and partners of employees may be hired as employees or consultants only if the appointment is based on qualification performance, skills, experiences and provided that there is no direct or indirect reporting relationship between the employee and his/her relative or partner

These principles of fair employment will apply to all aspects of all employment inclusion compensation, promotion and transfers as well as in case that the relationships develops after the respective employee has joined the company

Provided that they are equally suited as other candidates priority may be given to children of company employees with respect of internship, training period, employment during holidays and similar short term assignments



# SECTION V: CORPORATE OPPORTUNITIES

## We are committed to advance the company business:

Employees shall not compete with the company, nor shall they take personal advantage of business opportunities that they discover during the course of their employment, unless the company expressly waived its interests in pursuing such opportunity.

The employees want pursue business opportunities that might be of interest to the company, they shall inform their line manager, who will seek a management decision as to whether or not the company wants to pursue the opportunity, Even if the company decides against pursuing the opportunity, the employee may seize the opportunity on his or her own behalf only if it clear that doing so will not result in direct or indirect competition with the company operations.

# SECTION VII – ANTITRUST AND FAIR DEALING

## We believe in the importance of free competition:

Company to compete successfully in business environment and will always do so in full compliance with all applicable antitrust, competition and fair dealing laws. Therefore, employees must all times adhere to the following rules:

- Commercial policy and prices will be set independently and will never be agreed formally or informally, with competitors or other non related parties, whether directly or indirectly
- Customers territories or product markets will never be allocated between the company and its competitor but will always be the result of fair competition
- Customers and suppliers will be dealt with fairly

All employees, but especially those who are involved in marketing, sales and purchasing, or who are in regular contact with competitors, have a responsibility to ensure that they are familiar with applicable competition laws. When in doubt the legal function should be contacted in order to provide competition law advice and training.

# SECTION VII – CONFIDENTIAL INFORMATION

## We value and protect our confidential information and we respect the confidential information of others:

Confidential information consists of any information that is not or not yet public information. It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas product recipes, databases, records, salary information and any non published financial or other data.

Companies continued success depends on the use of its confidential information and its non disclosure to 3<sup>rd</sup> parties. Unless required by law or authorised by their management, employees shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of employment. Furthermore employees must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

Company respects that 3<sup>rd</sup> parties have a similar interest in protecting their confidential information. In case that 3<sup>rd</sup> party is such as joint venture partners suppliers or consumers, share with company confidential information, such information shall be treated with the same care as if it was company's confidential information. In that same spirit, employees shall protect confidential information that they have obtained in the course of their prior employment.

# SECTION IX – FRAUD PROTECTION OF COMPANY ASSETS ACCOUNTING

## We insist on honesty and we respect the company's assets and property:

Employees must never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of company or any 3<sup>rd</sup> party. This may not only entail disciplinary sanctions but also result in criminal charges.

Companies financial records are the basis for managing the company's business and fulfilling its obligations to various stakeholders. Therefore, any financial record must be accurate and in line with companies accounting standards.

Employees shall safeguard and make only proper and efficient use of companies property. All employees shall seek to protect companies property from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets including trademarks, know-how, confidential or proprietary information and information systems.

To the extent permitted under applicable law the company reserves the right to monitor and inspect how its assets are used by employees including inspection of all email, data, and files kept on company network terminals

# SECTION X – BRIBERY AND CORRUPTION

## We condemn any form of bribery and corruption:

Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a 3<sup>rd</sup> party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a 3<sup>rd</sup> party. Moreover, Employees must refrain from any activity or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereof.

Employees should be aware that the offering or giving of information benefits in order to influence the decision of the recipient, even if he or she is not a government official, may not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties.

Employees must be aware that election laws in many jurisdictions generally prohibit political contributions by corporations to political parties or candidates. Company has adopted a policy not to make such contributions except for the parent company in its country of origin any such contributions and any deviations from such policy must be approved by the CEO and the chairman

# SECTION XI – GIFTS, MEALS, ENTERTAINMENT

## We compete and do business based only on quality and competence:

Employees shall not be influenced by receiving favours nor shall they try to improperly influence others by providing favours. Employees may only offer or accept reasonable meals and symbolic gifts which are appropriate under the circumstances, and this shall not accept or offer gifts, meals, or entertainment if such behaviour could create the impression of improperly influencing the respective business relationship.

When assessing the situation in light of the above, employees shall consult the policy applicable in their market. If no such policy is available, They shall apply the most restrictive local practise in order to avoid even the appearance of improper dealings. When in doubt, shall seek guidance from his or her line manager or the legal or compliance function.

# SECTION XII – DISCRIMINATION & HARASSMENT

## We embrace diversity and respect the personal dignity of our fellow employees:

Company respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment. Therefore employees must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other reason.

Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with the HR Department

# SECTION XIII – FAILURE TO COMPLY

## We will consult the code, comply with its provisions and seek guidance where needed:

It is each employee's responsibility to ensure full compliance with all provisions of this code and to seek guidance where necessary from their line manager, or from the HR or the legal or compliance function. To "do the right thing" and to ensure the highest standards of integrity is each employee's personal responsibility that cannot be delegated.

When in doubt, employees should always be guided by the basic principle stated in the introduction to this code.

Any failure to comply with this code may result in disciplinary action, including the possibility of dismissal and, warranted, legal proceedings or criminal sanctions



# SECTION XIV – REPORTING ILLEGAL OR NON COMPLIANT CONDUCT

## We take responsibility for ensuring that we all act with integrity in all situations:

Employees shall report any practices or actions believed to be inappropriate under this code or even illegal to their line managers or the appropriate members of the HR or the legal or compliance function. If it is appropriate in view of the nature of the reported matter, reports of violations may be made directly to higher levels including the group's chief executive officer and or chief compliance officer.

Where appropriate, complaints may be made on a confidential basis or through employee hotline.

All complaints shall be properly investigated.

Company prohibits retaliation against any employee for such reports made in good faith while it also protects the rights of the incriminated person.

# CORPORATE BUSINESS PRINCIPLES

## SECTION 2

Issuing Dept : Legal & compliance

Target Audience: All Employees

Approver : CEO

Date Approved : Sept 2024

# INTRODUCTION

## Commitment of the chairman and the chief executive officer

For LEAFINOV Technologies and its subsidiaries to be successful over time, we must earn the trust of our employees consumers, customers, suppliers shareholders and wider society. This depends on us acting with integrity at all times and upholding our commitments. Trust in our company products, services and brands can only be built consistently step by step. This is why we take decisions with a long term view, while ensuring we meet our commitments today.

As a future technology company we unlock the power of technology to enhance quality of life for everyone today and for generations to come. In pursuing our purpose, we are guided by our values, which are rooted in respect.

Creating shared value is fundamental to how we do business at Leafinov Technologies. We believe that our company will be successful in the long term only by creating value for our people communities and shareholders, as well as for society and for the environment.

In line with our purpose and values and the way we do business, the corporate business principle set out in this document guide the actions and behaviours of everyone and the company and reflect our culture which will cultivate a strong culture for years to come.

They provide a strong ethical framework ensuring integrity of action and compliance with laws, Regulations and our own commitments.

On the foundation of strong business ethics and compliance, we do business sustainably and in a way that creates shared value. We conduct business in an ethical and principles based manner even in the absence of legal or regulatory frameworks. Where our own principles and policies are stricter than local legislation, the higher standard applies.

As the chief executive officer of LEAFINOV Technologies, we are committed to making sure that our entire company is managed and acts according to these principles and require adherence to them from all our employees across the organization and its subsidiaries.

# CORPORATE BUSINESS PRINCIPLES- STRUCTURE

## Section I: Customers

- Technology to create value for customer business
- Product & Service quality assurance
- Timely communication

## Section II: Our People

- Human rights & learning
- Diversity & inclusion
- Healthy and safe workplace

## Section III: Value system

- Core organization values
- Customers & business partners
- Social and Environmental responsibility

## Section IV: Business Integrity

- Ethical & Integrity
- Privacy & ethical data management

## Section V: Transparency in communication

- Timely, quality communication internal and external
- Engagement and advocacy

## Section VI: Compliance

# SECTION I - CUSTOMERS

## Technology to create value for customer business :

Our commitment to provide best in class technology products & solutions , objective is to help customer(s) leverage technology to create value for business. We strive to be the first choice partner for our customers. We are committed to bring the future technologies to our customer and be the best Technology company in the fields we operate

## Product & Service quality assurance :

Our commitment is to provide workable, sustainable product and solutions. Our quality standard essentials and elements, including:

- Develop products, solutions & services that are trusted and preferred to enhance quality of life and human experience
- Maintain highest Tech safety standards
- Challenge ourselves to continuously improve product quality and privacy aiming for zero defect
- Inspiring ownership of product quality & privacy by all employees and third parties in our value system

## Customer communication:

Our communication aim for a regular dialogue and engagement with our stakeholders. We are committed to reporting our performance by providing full relevant information to legitimately interested parties, subject to any overriding consideration of business confidentiality.

We seek to listen and respond to our interactions with employees, business partners, local communities and stakeholders , honestly and responsibly.

# SECTION II – OUR PEOPLE

## Human rights & Learning :

We respect and promote Human rights in our operations and entire value chain.

We are committed to the principles of fundamental rights and labour regulatory laws and policies as per country law and regulations.

We take action against any violations of human rights in our operations and value chains with zero tolerance to child labour, forced labour

## Diversity & Inclusion :

Our long term success depends on our capacity to attract develop and retain best performing employees who respect our values and adhere to our purpose of unlocking the power of technology to enhance quality of life for everyone, today and for generations to come.

We promote inclusion of all communities, cultures, ages into our workforce to leverage the diversity of thinking to drive creativity and innovation.

We are committed to enhancing gender balance and providing equal opportunities for everyone at our company.

We do not tolerate any discrimination due to origin, nationality, religion, race, gender, age, physical condition, sexual orientation, or engage in or permit any kind of harassment based on any of the above or for any other reason. We are committed to treat each other with respect and dignity

## Health & safety at workplace:

We are committed to preventing accidents, injuries and illness related to work and to protecting employees, contractors and others involved along the value chain.

Our policy on safe and healthy lives at work is an integral component of our value of respect for ourselves and for others around us. We recognise and require that everyone plays an active role in maintaining a safe and healthy working environment. We promote our health and safety policy in various forums like trainings, internal communications, posters

# SECTION III – VALUE SYSTEM

## Core Organization Values:

### Respect

Our people have the opportunity to progress irrespective of gender, ethnicity, or other differences.

### Honesty

Staff and business partners are encouraged to speak up and celebrate those who do right things

### Integrity

By committing to our policies and rules, we empower our staff and business partners to make right decisions.

## Customers & Business partners:

We demonstrate honesty integrity and fairness to our customers.

In our business activities we expect our trade partners to adhere to business principles consistent with our own. Should they demonstrate a lack of adherence with any of our business principles, we will request an open and transparent discussion, establish corrective actions or terminate the relationship, if necessary. Conversely we respect our partners' reasonable standards.

## Health & safety at workplace:

We commit ourselves to environmentally sustainable business practises throughout our value chain using natural resources and greenhouse technology In all our operations and production line. Through our commitments we contribute to , reduce the use of plastic and make its use sustainable.

# SECTION IV – BUSINESS INTEGRITY

## Ethics and integrity:

The company code of business conduct specifies certain non- negotiable minimum standards in key areas of employee behaviour, including integrity compliance with laws, conflicts of interest, antitrust and fair dealing, bribery, corruption, discrimination and harassment, and accurate reporting and accounting

## Privacy and ethical data management:

Our company respects the rights of individuals in relation to their personal data and recognises privacy as being a fundamental human rights. Our commitment to protect personal data and privacy is reflected in our global privacy policy.

We avoid using data and technology in ways that are unethical or could lead to discrimination, exploitation or cause harm. We are committed to the ethical use of artificial intelligence based on the following 1- transparency, 2- diversity, 3-privacy and security, 4- environmental and social well being, 5- accountability



# SECTION V – TRANSPARENCY IN COMMUNICATION

## Timely, clear communication internal and external:

We advocate an innovative, transparent and open work environment, Where each employee is respected, has their liberty to engage, create and contribute, The ability to speak.

Therefore everyone in the organisation is encouraged to speak openly on any matter.

## Engagement & Advocacy :

Our purpose of unlocking the power of technology to enhance quality of life, productivity, skill and experience for everyone, today and for future generations to come. We understand and believe that it is essential to carry out responsible stakeholder engagement and advocacy to bring in relevant external views on matters related to our business activities and operations in ways that foster collaboration, knowledge sharing, open discussion and dialogue.

When engaging with public authorities in relation to public policy development and implementation, we are committed to transparent, responsible interactions.

# SECTION VI – COMPLIANCE

The corporate business principles are mandatory for all LEAFINOV Technologies and its subsidiary companies employees and are supported by our code of business conduct and other policies.

Where our own policies and principles differ from local legislation the higher standard applies

Our compliance initiative supports continuous development and implementation of organization corporate business principles based on ethics, integrity and doing the right thing

# CORPORATE SOCIAL RESPONSIBILITY

## SECTION 3

Issuing Dept : CSR Committee & Board of directors

Target Audience: CSR Activities and relation agencies, group, personnel

Approver : Board of Directors

Date Approved : Sept 2024

# SECTION 3 – CORPORATE SOCIAL RESPONSIBILITY

LEAFINOV Technologies Pvt Ltd and its subsidiaries and products, as responsible citizens of the community, we participate in business activities which help in improving the quality of life for communities where it operates. This also includes creating better livelihood opportunities.

In consultation with stakeholders, company has decided to focus on activities which can create maximum value. The focus areas are:

- **Education:**

Our Mantra, all-round drawing out the best in children and adult being; body, mind, and spirit- By Mahatma Gandhi

- **Environment:**

Our Mantra: Every small step in nurturing our environment is a great step, let's move a step everyday

- **Livelihood:**

Unemployment is A major issue impacting development and health outcomes. Company would focus on livelihood enhancement through trainings.

# SECTION 3 – CSR GOVERNANCE, IMPLEMENTATION

## GOVERNANCE:

- Company governance is headed by CSR committee reporting to board of directors of the company.
- CSR committee consists of 4 members with at least 1 director and 1 independent director and rest Sr management personal
- CSR committee provides project prospects, annual action plan, fund requirements, project monitoring and reporting mechanism to Board of directors
- CSR committee determines the over all scope of , provide input on, and recommendation adoption of CSR report to board of directors of the company & reviews the effectiveness of CSR policy and activities included in policy

## Selection & implementation of CSR activities:

- CSR Committee creates a guiding principle for annual action plan
- Projects require multi year implementation and completion to be informed to board of directors, subject to no project may exceed 3 financial years excluding the year of commencement
- CSR committee may if required recommend to board of directors as part of the CSR policy, activities outside of the defined policy focus areas.
- Implementation of CSR projects may be done by company personnel and partnership with expert agencies, NGOs & Govt
- All CSR activities will be monitored by company and company personnel.

# PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

## SECTION 4

Issuing Dept : Human Development Capability

Target Audience: All personnel associated with company, subsidiary, products, including employees, partners, directors, board of directors, CEO

Approver : Board of Directors

Date Approved : Sept 2024

# SECTION 4 – POSH PURPOSE

The sexual harassment of women at workplace ( prevention ,prohibition and redressal ) act, 2013 came into force on 9<sup>th</sup> December 2013 and it applies to all companies/ organisations conducting business in India with more than 10 employees.

Sexual harassment results in violation of the fundamental rights of a person to equality, their right to life to live with dignity and right to practise their profession which includes a safe environment free from sexual harassment.

The objective of this policy on prevention of sexual harassment is to provide protection against sexual harassment at workplace and for prevention and redressal of complaints of sexual harassment and for matters connected with and incidental to it. It is a non negotiable requirement to ensure safety of all employees at the workplace.

**“ Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination” – LEAFINOV Corporate Business Principles.**

This policy on prevention of sexual harassment or workplace guideline has been framed in accordance with the provisions of the sexual harassment women at workplace prevention province prohibition and regional act 2013 and rules framed there under Accordingly while the policy covers all the key aspects of the act for any further clarification reference shall always be made to the act.

# SECTION 4 – POSH SCOPE

This policy is applicable to any person employed at the workplace ( including virtually), 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 expressed or implied and includes a co worker, a contract worker, probationer, trainee, apprentice or by any other such name.

While as per posh act, only women are covered, any other gender too can approach the committee In case of sexual harassmt the committee will address it with the same regard as any other complaint.



# SECTION 4 – POSH DEFINITION

## Definition:

Sexual harassment may occur not only where a person uses sexual behaviour to control influence or affect the career salary or job of another person, but also between co workers. It may also occur between a LEAFINOV employee and someone that employee deals with within the course of their work who is not employed by the company.

“ Sexual harassment” includes anyone or more of the following unwelcome acts or behaviour(whether directly or by implication):

- A) Any on welcome sexually determined behaviour, or pattern of conduct, that would causeway discomfort and /or humiliate a person at whom the behaviour or conduct was directed namely:
  - I. Physical contact and advance
  - II. Demand or request for sexual favors
  - III. Sexually coloured remarks or remarks of a sexual nature about a person’s clothing or body
  - IV. Showing pornography, Making or posting sexual pranks, sexual teasing, sexual jokes, Sexually demeaning or offensive pictures, Cartoons or other materials through email, SMS, MMS etc
  - V. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s sexual wishes
  - VI. Giving gifts or leaving objects that are sexually suggestive

# SECTION 4 – POSH DEFINITION - CONTINUED

- Vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy
- Viii. Persistent watching, following, contacting of a person
- ix. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

B) The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to sexual harassment :

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about the present or future employment status
- Interference with the person's work or creating an intimidating or offensive or hostile work environment ; or
- Humiliating treatment likely to affect their health or safety

The reasonable person standard shall be used to determine whether or not the conduct was offensive or what a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the person but on the experience of the aggrieved.

# SECTION 4 – POSH DEFINITION - CONTINUED

Vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy

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- Humiliating treatment likely to affect their health or safety

The reasonable person standard shall be used to determine whether or not the conduct was offensive or what a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the person but on the experience of the aggrieved.

# SECTION 4 – POSH – MECHANISM & COMMITTEE

## Redressal Mechanism- Formal Intervention

If in the competence view there has been an incident of sexual harassment which is serious enough to warrant formal intervention,, the complainant should lose a written complaint, It shall be followed by a formal redressal mechanism as described in this policy. In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant and will be obtained. Complaint should be made immediately after the alleged offence is committed unless the complainant submit sufficient causeway for a delay, as described in “lodging a complaint” section.

## Internal Committee(henceforth known as ‘committee’)

Prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an “ internal committee” Shall be constituted at each location. The details of the committee should be notified to all covered persons at the location(workplace).

### The committee will comprise of:

- Presiding officer: An woman employed at a senior level in the organisation or workplace
- At least two members from amongst employees, committed to the causeway of women and Oregon having legal knowledge
- One external member, familiar with the issues relating to sexual harassment
- At least one half of the total members must be women

# SECTION 4 – POSH – MECHANISM & COMMITTEE

The presiding officer and every member of the ic should hold office for a maximum period of three years from the date of their appointment

**The committee shall be responsible for:**

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

**Aggrieved:** In relation to a workplace, a person of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.

**Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved

**Employee:** In addition to the place of work (including virtual), for any work on regular,, temporary, ad hoc or Delhi 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 terms of employment are express or implied and includes a co worker, a contract worker, probationer, trainee, apprentice or by any other such name

# SECTION 4 – POSH – MECHANISM & COMMITTEE..

## **Workplace:**

In addition to the place of work (including virtual/ head office, branch office , Factories) Its also include any place where the aggrieved or the respondent visits in connexion with their work, during the course of and /or arising out of employment/ contract/ engagement with LEAFINOV TECHNOLOGIES PVT LTD, Including transportation provided for undertaking such a journey.

**Employer:** A person responsible for management, supervision and control of the workplace

# SECTION 4 – POSH – LODGING A COMPLAINT

The complainant should submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee member at the workplace. The complaint must be lodged within three months from the date of incident/ Last incident. The committee can extend the timeline by another three months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint. Provided that where such a complaint cannot be made in writing, the presiding officer or any member of the internal complaint committee shall render all reasonable assistance to the aggrieved for making the complaint in writing.

If the aggrieved is unable to lodge the complaint in account of their incapacity,, the following may do so on their behalf, with their written consent ( Legal heir, Relative or friend, co worker, any person having the knowledge of the incident)

If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

Wherever possible it is desirable that complaints of harassment be dealt with speedily, Discretely and as close as possible to the point of origin. Restricting the number of participants involved in handling the complaint,, strict confidentiality, sensitivity and calmness can often satisfactorily resolve most of the minor incidents.

# SECTION 4 – POSH – RECEIVING A COMPLAINT

Dealing with incidents of harassment is not like any other type of dispute, complainants may be embarrassed and distressed and it will require exercising tact and discretion while receiving the complaint. Post receipt of the complaint, if the IC recognizes the respondent to be the employer, Necessary steps to be taken by ic to forward the complaint to LC( Local Committee) As per due process.

The following points must be kept in mind by the receiver of the complaint:

- **Complaint should be listened to** and the complainant informed that the company takes the concern seriously. Complainant should be informed that these concerns will be reported to the appropriate committee and follow up will be done speedily
- **Situation should not be prejudged.** Written notes should be taken while listening to the person. Complainant should be allowed to bring another person to the meeting if they wish. When taking accurate notes, complaints and own words, where possible, Should be used. Clear description of the incident in simple and direct terms should be prepared and detail should be confirmed with the complaint.
- All notes should be kept strictly confidential in a safe place. Complacence agreement should be taken to allow proceeding with the matter, which may involve a formal investigation
- The complainant must be advised that although the process is confidential the responder will have to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complaint's identity
- Care must be taken to **prevent any disadvantage to or victimisation** of either the complainant or the respondent



# SECTION 4 – POSH – RESOLUTION PROCEDURE

## Resolution procedure through consolation

Once the complaint is received, Before initiating the inquiry the committee may take steps to conciliate the complaint before the complainant end and the respondent. **This is only requested by the aggrieved.** Whether the option for consolidation is exercised or not by the complainant, The response of the complainant should be recorded. It should be understood by all parties that consultation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues could be resolved or misunderstandings cleared. In case a settlement is arrived at, the committee shall record it and report the same to the employer for taking appropriate action. Resolution through conciliation Should happen within two weeks of recipient of complaint. The committee shall provide copies of the settlement to complainant and respondent. Once the action is implemented, no further inquiry will be conducted

## Resolution procedure through formal inquiry

### Conducting inquiry:

The committee can initiate inquiry in the following cases :

- No Conciliation is requested by the aggrieved
- Consolidation has not resulted in any settlement
- Complainant informs the committee that any term or condition of the settlement arrived through conciliation, Has not been complied with by respondent

The committee shall proceed to make an inquiry into the complaint within a period of 1 week of its receipt of original complaint

# SECTION 4 – POSH – MANNER OF INQUIRY

## Manner of inquiry into complaint:

- Complainant should submit the complaint along with supporting documents and the names of the witnesses
- Upon receipt of the complaint, committee should send one copy of the complaint and all supporting documents received from the complainant to respondent within seven working days
- Respondents should reply with all supporting documents within 10 working days of receiving the copy of the complaint and this should be shared as is with the complainant
- No legal practitioner can represent any party at any stage of the inquiry procedure
- The complaints committee shall make inquiry into the complaint in accordance with the principles of natural justice
- In conducting the inquiry, a minimum of three committee members including the Presiding officers will be present

**Interim relief:** During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to-

- Transfer the complainant or the respondent to any other workplace
- Grant leave to the aggrieved of maximum three months, In addition to the leave she would be otherwise entitled
- Prevent the respondent from assessing complainants work performance
- Grant such other relief as may be appropriate. Recommendations of the interim relief are implemented, the employer will inform the committee regarding the same

# SECTION 4 – POSH – TERMINATION OF INQUIRY

## Termination of inquiry:

Committee can dominate inquiry or give ex-parte decision, If

- Complainant or respondent respectively is absent for three consecutive hearings, without reason
- 15 day return notice to be given to the party, before termination or ex-parte order

# SECTION 4 – POSH – INQUIRY PROCEDURE

## Inquiry procedure:

All proceedings of the inquiry should be documented. The committees will interview the respondent separately and impartially. Committee should state exactly what the allegation is and who has made the allegation. The respondent should be given full opportunity to respond and provide any evidence etc. Detailed notes of the meeting should be prepared which may be shared with the respondent and compliment upon request. Any witness produced by the respondents should be interviewed and statements should be taken.

If the complainant or respondent desires to cross examine any weaknesses the committee should facilitate the same and record the statements.

In case complainant or respondent seeks to ask questions to the other party, they may give them to the committee we shall ask them and record the statement of the other party. Any such enquiry should be completed, including the submission of the inquiry report, within 90 days from the date on which the inquiry is commenced, the inquiry procedure should ensure absolute fairness to all parties.

## Considerations while preparing inquiry report:

While preparing the findings/ recommendations, following should be considered:

- Whether the language used(written or spoken), visual material or physical behaviour was of sexual or derogatory nature
- Whether the allegations or events follow logically and reasonably from the evidence
- Credibility of complainant, Respondent, Witnesses And evidences
- Other similar facts, evidence, for example, If there have been any previous accounts of harassment pertaining to the respondent
- Both parties have been given an opportunity of being heard, And copy of the proceedings were made available to both parties
- A copy of the final recommendations will be shared with the Complainant and the respondent

# SECTION 4 – POSH – ACTION POST INQUIRY

## Action to be taken after inquiry:

Post the inquiry, the committee will submit its report containing the findings and recommendations to the employer, within ten days of completion of the inquiry.. If the situation so requires, or upon request of the complainant, respondent, or witness, management may decide to take interim measures such as transfer, Changing up shift, grant of leave etc, to protect against victimisation or distress during or after the course of inquiry pending the final outcome.

## Complaint unsubstantiated

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the employer that no action is required to be taken in this matter. Further, the committee should ensure both parties understand that the matter has been fully investigated, That the matter is now concluded, And neither will be disadvantaged within the company.

## Complaint substantiated( Act upon the recommendations within 60 days and confirm to the committee)

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take necessary action for sexual harassment as a misconduct, In accordance with the applicable service rules and policies and this may include:

- |   |  |                      |
|---|--|----------------------|
| 1. Counselling  | 4. Written warning                         | 7. Termination       |
| 2. Censure or reprimand                                 | 5. Withholding promotion and or increments | 8. Community service |
| 3. Apology to be tendered by respondent                 | 6. Suspension                              |                      |
| 9. Or any other action that the management may deem fit |  |                      |

# SECTION 4 – POSH – MALICIOUS ALLEGATIONS

## Malicious allegations:

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved or any other person making the complaint has made the complaint knowing it to be false or the aggrieved or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the complainant or the person making the complaint.

The action recommended should be similar to the ones proposed for the respondent in case of substantial complaint

While deciding malicious intent, the committee should consider that:

- Mere inability to substantiate a complaint need not mean malicious intent
- Malicious intent must be clearly established

# SECTION 4 – POSH – CONFIDENTIALITY , APPEAL

## Confidentiality:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained during inquiry process, recommendations of the committees, action taken by the employer will be considered as confidential materials, and not published or made known to public or media

Any person contravening the confidentiality clauses will be subject to disciplinary action as prescribed in the act

## Appeal

Any party not satisfied or further aggrieved by the implementation or non implementation of recommendations made, appeal to the appellate authority in accordance with the act and rules, within **90 days** of the recommendations being communicated

# SECTION 4 – POSH – ROLES AND RESPONSIBILITIES

## Employee:

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- Refusing to participate in inactivity which constitutes harassment
- Supporting the person to reject unwelcome behaviour
- Acting as a witness if the person being harassed decides to lodge a complaint

All are encouraged to advise others of behaviour that is unwelcome. Often, Some behaviours are not intentional. While this does not make it acceptable, It does give the person behaving inappropriately, The opportunity to modify or stop their offensive behaviour.

## Line manager

Individual managers are responsible for ensuring that this policy is applied within their own area. They must also ensure that all employees understand that harassment will not be tolerated

## HR

The owner of this policy is HR Department. HR Department has the responsibility for ensuring the maintenance, regular review and updating the policy. Any queries on the application or interpretation of this policy must be discussed with hr Department. Further any complaints received under this policy will be handled by the Internal Committee of the respective location as per the guidelines provided

For any queries related to the understanding of the policy, do direct them to your hour managers or hour business partners at the branch, factory or head office. To report any misconduct, do contact any member of the internal committee



# THANK YOU

Risk & Compliance Office  
LEAFINOV Technologies Pvt Ltd