



Sexual Harassment of Women at Workplace (POSH) Policy

Dated: 30th December 2022

1. Introduction and Purpose

We are committed to ensuring a work environment free from sexual harassment where every employee is treated with dignity and respect. The purpose of this policy is to:

- Prevent and prohibit sexual harassment at the workplace.
- Provide a safe mechanism for addressing and redressing complaints.
- Comply with the legal framework established under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

2. Scope and Applicability

This policy applies to:

- All employees of Garnet Global Consultants LLP ("**Firm**"), including partners, staff, interns, and trainees.
- Any individual engaged in work-related activities (e.g., clients, visitors, vendors) while on company premises or during work-related events.
- The policy covers all forms of communication and conduct within the workplace, including online interactions.

3. Definitions

- **Sexual Harassment:** Any unwelcome sexually determined behaviour (verbal, non-verbal, or physical) that may affect the dignity of a woman, create an intimidating environment, or result in any form of detriment. This includes, but is not limited to, physical contact, unwelcome advances, sexually explicit remarks, and any other behaviour of a similar nature.
- **Workplace:** Includes company offices, client sites, virtual workspaces, and any other location where business is conducted on behalf of the firm.
- **Complainant:** The person who alleges that they have been subjected to sexual harassment.
- **Respondent:** The person against whom the complaint of sexual harassment is made.
- **Internal Complaints Committee (ICC):** A body formed by the firm to receive and address complaints of sexual harassment, ensuring a fair, prompt, and impartial inquiry.

4. Policy Statement

Garnet Global Consultants LLP strictly prohibits any form of sexual harassment. Our firm is committed to:

- Creating a work environment where every employee feels safe and respected.
- Promptly addressing complaints of sexual harassment in a fair and confidential manner.
- Ensuring that no individual suffers any retaliation or victimization for raising a complaint or participating in an inquiry.

5. Responsibilities

5.1. All Employees

- Treat colleagues and stakeholders with dignity and respect.
- Refrain from any behaviour that could be interpreted as sexually harassing.
- Report any instances of sexual harassment or suspicious behaviour through the designated channels.

5.2. Management

- Ensure that all employees are aware of this policy and receive periodic training on preventing sexual harassment.
- Create a safe environment for the complainant to report incidents without fear of reprisal.
- Cooperate fully with the Internal Complaints Committee during investigations.

5.3. Internal Complaints Committee (ICC)

- Conduct a prompt, impartial, and confidential inquiry into complaints of sexual harassment.
- Make recommendations for remedial action, including disciplinary measures against the respondent.
- Ensure that all parties are treated with fairness and that the process is completed in a timely manner.

6. Internal Complaints Committee (ICC) Structure

The ICC shall consist of:

- A Presiding Officer: A senior employee, preferably from a different department, who has the requisite experience in dealing with such matters.
- At least two members from within the organization, with at least one member being a woman.
- An external member with expertise in issues relating to sexual harassment, to ensure impartiality and sensitivity.

The ICC is responsible for:

- Receiving and addressing complaints of sexual harassment.
- Conducting confidential inquiries and gathering evidence.

- Submitting a report with findings and recommendations to the management.
- Ensuring that the privacy and dignity of all involved parties are maintained throughout the process.

7. Complaint Mechanism and Procedure

7.1. Filing a Complaint

- **How to Report:** Complaints can be made in writing, verbally (in the presence of a witness), or via email to the designated ICC representative.
- **Details Required:** The complaint should include details of the incident(s), dates, locations, and any witnesses or evidence that may support the claim.

7.2. Timeline

- **Prompt Action:** The ICC shall initiate the inquiry within 10 working days of receiving the complaint.
- **Inquiry Period:** The complete inquiry should be conducted and resolved within a reasonable timeframe, generally not exceeding 90 days.

7.3. Interim Measures

- While the inquiry is underway, Garnet Global Consultants LLP may implement interim measures, such as:
 - Adjusting work arrangements or locations.
 - Granting leave or modifying responsibilities.
 - Restricting the respondent's access to certain work areas.

7.4. Confidentiality

- All information related to the complaint, inquiry, and subsequent actions will be kept strictly confidential.
- Disclosure of the details will be limited to those directly involved in the investigation or as required by law.

8. Redressal and Consequences

8.1. Inquiry Outcome

- If the complaint is found to be substantiated, appropriate remedial action will be taken. This may include counselling, warnings, suspension, termination, or legal action against the respondent.
- If the complaint is unsubstantiated, the ICC shall inform the complainant and the respondent of its findings, while ensuring that confidentiality is maintained.

8.2. Support for the Complainant

- Garnet Global Consultants LLP shall offer support services, including counselling and legal assistance, as needed.

- The complainant will not face any retaliation or discrimination as a result of lodging a complaint.

9. Prevention Measures and Awareness

- **Training:** Mandatory regular training sessions for all employees on recognizing and preventing sexual harassment.
- **Communication:** The policy will be prominently displayed on the company intranet, notice boards, and communicated during onboarding sessions.
- **Monitoring:** Periodic surveys and feedback mechanisms will be used to assess the work environment and effectiveness of this policy.

10. Review and Amendments

- This policy will be reviewed annually and updated as necessary to remain compliant with applicable laws and best practices.
- Any changes to the policy will be communicated to all employees and relevant stakeholders.

11. Implementation

- This policy is effective immediately upon approval by the Directors of Garnet Global Consultants LLP.
- All employees, regardless of position, are required to adhere to the provisions of this policy.

By adopting this Sexual Harassment of Women at Workplace (POSH) Policy, Garnet Global Consultants LLP reaffirms its commitment to providing a safe, respectful, and equitable work environment for all employees. For further clarification or support, employees may contact the designated ICC representative or any of the two Directors of the Company.

For GARNET GLOBAL CONSULTANTS LLP

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