



POSH POLICY

Current Version	Version 1.0	Drafted by	Tarun Agarwal
Effective Date	1 July 2025	Reviewed by	Tarun Agarwal
Next Review Date	1 July 2026	Final Approval by	Samuel John

Introduction

This policy is formulated in accordance with the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* (referred to as the *POSH Act, 2013*). mistEO Private Limited is committed to providing a work environment that ensures every woman employee is treated with dignity and respect and is protected against sexual harassment.

1. Objective

To prevent, prohibit, and provide redressal of sexual harassment at the workplace. This policy aims to uphold women employees' right to equality, safety, and dignity at work.

2. Scope

This policy applies to:

- All employees (permanent, temporary, contractual, interns, consultants).
- All locations and virtual environments (office premises, off-site locations, events, travel, online meetings).
- All women, including third parties visiting the workplace.

3. Definition of Sexual Harassment

As defined under the POSH Act, 2013, sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

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

Further, the following circumstances may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in employment.
- Implied or explicit threat of detrimental treatment.
- Interference with work or creation of an intimidating, hostile or offensive work environment.
- Humiliating treatment likely to affect health or safety.

4. Internal Complaints Committee (ICC)

mistEO has constituted an **Internal Complaints Committee (ICC)** as mandated by the POSH Act. It includes:

- **Presiding Officer:** A senior female employee.
- **Two Members:** Employees with awareness of gender issues or experience in social/legal matters.
- **External Member:** A third-party expert from an NGO or social/legal background.

5. Complaint Procedure

- Complaints must be made in writing by the aggrieved woman within **3 months** from the date of the incident.
- The complaint may be submitted physically or via email to the ICC.
- ICC will initiate an inquiry within **7 days** of receiving the complaint.
- Inquiry proceedings will be completed within **90 days**.
- The ICC will submit its findings and recommendations to the employer within **10 days** of concluding the inquiry.

6. Redressal Process

- Both parties will be given equal opportunity to be heard.
- Confidentiality will be maintained throughout.
- Interim measures (such as transfer or leave) may be recommended to ensure safety.
- The ICC will ensure fair and timely resolution.

7. Disciplinary Action

If the ICC concludes that harassment occurred, it may recommend:

- Written apology.
- Warning or reprimand.
- Transfer or suspension.
- Salary deductions or withholding promotion.
- Termination of employment.

If a complaint is found to be false with malicious intent, appropriate disciplinary action may be taken against the complainant, following due process.

8. Confidentiality

All complaints, proceedings, and recommendations shall be kept strictly confidential. Any breach will lead to disciplinary action.

9. Protection Against Retaliation

mistEO ensures protection against retaliation or victimization of complainants, witnesses, and members supporting the complaint in good faith.

10. Awareness and Sensitization

mistEO will:

- Conduct POSH awareness programs regularly
- Include POSH sensitization in onboarding
- Train ICC members to handle cases sensitively and fairly

11. Roles and Responsibilities

Employees must:

- Respect colleagues' dignity
- Avoid any behavior that may be perceived as inappropriate
- Report harassment or assist in investigations

Managers must:

- Lead by example
- Support affected employees
- Ensure no retaliation occurs

12. Review and Amendment

This policy will be reviewed annually or as required for legal compliance and effectiveness. Amendments will be approved by management and communicated to all employees.

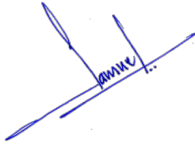
POSH Internal Complaints Committee Members

Below are the details of mistEO's ICC members

- Presiding officer – Ms.Ani Varghese
- Internal member – Mr.Tarun Agarwal
- Internal member – Mr.Sudheesh TM
- External member – Ms.Bagmisikha Puhan

Note: While this policy is framed in accordance with the POSH Act, 2013, which is applicable to women, mistEO is committed to providing a safe and respectful work environment for *all employees*, regardless of gender, and will address all complaints of harassment with equal seriousness.

Signature:



Name: Samuel John

Employee ID: 001

Date: 1 July 2026

