

Transaction Solutions International (India) Private Limited

POSH Policy

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POSH Policy

1. Introduction

At TSI, we encourage harmonious work relations, based on mutual trust and respect, between all employees. Discrimination and harassment of any type are strictly prohibited. TSI wishes to promote and maintain this culture to ensure that employees do not engage in practices that are abusive in any form or manner whatsoever.

2. Objective:

Accordingly, the Company has framed the Policy for the Prevention of Sexual Harassment (“the Policy”) which is outlined under the Sexual harassment of women at Workplace (Prevention, Prohibition and Redressal) ACT, 2013.

3. Applicability

This is a global policy and extends to all employees of TSI including those employed on a contractual basis and interns. Where any sexual harassment is caused to a TSI employee as a result of an act by a third party or outsider, while on official duty, TSI will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

Effective Date: 1st May 2018.

4. Definition of Sexual Harassment

Sexual Harassment as per this policy is a form of workplace harassment of a sexual nature that affects the dignity of employees at work. Sexual harassment includes such unwelcome sexually determined behavior (whether directly or by implication) as:

- Physical contact and advances, repeatedly standing too close to or brushing up against a person.
- A demand or request for sexual favors
- Sexually colored remarks
- Showing pornography
- Unwelcome physical, verbal, or non-verbal conduct of sexual nature
- Sexual pranks, or repeated sexual teasing, jokes, in person or via e-mail
- Giving gifts or leaving sexually suggestive objects
- Repeatedly asking a person to socialize during off-duty hours when the person has said no or has indicated they are not interested (managers, in particular, should be careful not to pressurize their employees to socialize against their wish)

Sexual harassment would also mean:

- A. **Quid pro quo sexual harassment**, which means something in return or exchange of one thing for another. In the workplace, quid pro quo sexual harassment takes place if sexual favors are asked in exchange for any kind of special treatment on the job. Threatening an employee if they do not consent to such sexual advances or favors also amounts to sexual harassment. The act of 'asking' may either be verbal or implied and the 'sexual conduct' may be verbal or physical.
- B. **A hostile work environment** arises when a co-worker or supervisor creates a work environment through verbal or physical conduct of a sexual nature that interferes with another co-worker's job performance or creates an intimidating workplace atmosphere, hostile offensive, or humiliating and experienced as an attack on personal dignity.

5. Internal Complaints Committee (ICC)

The Internal Complaints Committee (hereinafter referred to as the ICC) has been constituted for a timely and impartial resolution to complaints of sexual harassment. It consists of senior employees of TSI along with an independent member.

The minimum quorum for ICC to hold an investigation is 3 members with below composition:

- A. One presiding officer who is a senior women employee of TSI
- B. Two or more members who are senior employees of TSI

Additionally, as applicable under local laws, one independent member working in the field of human rights/ with an NGO may also be a part of the ICC subject to the condition that at least half of the members in the quorum are women and at least one member in the quorum is a male.

6. Filing of a Complaint

If any employee believes that they have been subjected or are being subjected to sexual harassment, such person may file a complaint by writing at speak@tsiplc.com.

The complaint should include the circumstances giving rise to the complaint, the dates of the alleged occurrences, and names of witnesses if any.

The complaint must be made to the ICC as soon as the incident occurs and no later than 3 (three) months from the incident of sexual harassment and in case of a series of incidents, within a period of three months from the date of the last incident.

Complaints brought after that period will not be pursued unless extraordinary circumstances were preventing the complainant from raising the concern. The determination of whether the complaint was timely, or extraordinary circumstances exist to extend the complaint period will be made by the ICC.

Where the aggrieved employee is unable to make a complaint on account of their physical or mental incapacity or death or otherwise, their legal heir, friends, relatives, co-workers, psychologist, psychiatrists, may make a complaint within 3 months of the incident.

7. Process of Inquiry

The complainant is advised to keep a record of incidents (dates, times, locations, possible witnesses, what happened, your response, etc). It is not mandatory to have a record of events to file a complaint, but a record can strengthen the case and help the complainant remember the details over time.

Below is the process of inquiry that will be followed by the ICC on receiving a complaint:

- A. The ICC will ask the complainant to prepare a detailed statement of incidents/allegations. The statement of allegations will be shared with the respondent (the person against whom the complaint is made)
- B. The respondent will be asked to prepare a response to the statement of allegations and submit it to the ICC within the given time.
- C. The ICC will organize verbal hearings with the complainant and the respondent.
- D. The Committee will take testimonies of other relevant persons and review the evidence wherever necessary.
- E. The Committee will decide carefully and fairly reviewing the circumstances, evidence, and relevant statements.

The ICC will ensure that in the course of investigating a complaint:

- A. Both parties will be given a reasonable opportunity to be heard along with witnesses and to produce any other relevant documents
- B. Upon completion of the investigation, both parties will be informed of the results of the investigation.
- C. Ensure that sufficient care is taken to avoid any retaliation against the witnesses. Both parties refrain from any form of threat, intimidation, or influencing of witnesses.
- D. An investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.

The ICC before initiating an inquiry, at the request of the complainant could take steps to settle the matter between the complainant and the respondent through conciliation provided that no monetary settlement shall be made as a basis of conciliation. The minutes of the conciliation will be documented by the ICC and shared with both the complainant and the respondent. Where a settlement has arrived, no further inquiry shall be conducted by the Committee.

8. Decisions and Action

Once the investigation is completed, a determination will be made regarding the validity of the harassment allegations. If it is determined that harassment has occurred, appropriate disciplinary action shall be taken against the respondent employee. Disciplinary action may include transfer, suspension, or termination, etc.

The ICC will also have the discretion to make appropriate recommendations concerning the complainant and/or respondent (pending the outcome of a complaint) including transfer, leave, change of work location/ department etc.

The ICC would be sharing recommendations with the Human Resources team. The disciplinary action will be carried out by the HR department. The HR department is required to act on the ICC recommendations within 30 days of receipt of the inquiry report. This action shall be in addition to any legal recourse sought by the complainant.

This policy has evolved as a tool to ensure that in the interest of fair play, TSI employees have a forum to approach in the event of instances of harassment. However, if in investigation it is revealed that the complaint was made with malicious intent and with the motive of maligning the concerned individual/tarnishing her/his image in the company and/or to settle personal/ professional differences, strict action will be taken against the complainant.

9. Policy Review

The policy will be reviewed by the HR department as and when required. TSI reserves the right to amend and modify the entire policy or any part of it at any time.

10. Internal Complaints Committee Members

S No	Present ICC Member	New ICC Member	Level
1	Rima Mazumder	Sarika Agarwal	Presiding Officer
2	Amit Sharma	Amit Sharma	Member
3	Ekta Khandelwal	Ekta Khandelwal	Member
4	Ambika Pradhan	Ambika Pradhan	Member
5	Pragya Ohri	Pragya Ohri	External Member

Additionally, as applicable under local laws, one independent member working in the field of human rights/ with an NGO may also be a part of the ICC.

The committee can also choose to designate a local member to oversee the process and contribute to the local context.

Only the HR team is authorized to make alterations to this policy. If alterations are made, the policy document on the HR portal will be updated.