

Prevention Of Sexual Harassment (POSH) Policy



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Processes, Policies & Guidelines

This document outlines the company's policy for Prevention of Sexual Harassment (Prevention, Prohibition and Redressal of Sexual Harassment of Woman at Workplace.)

Preamble

Mobiuso Technologies India Pvt. Ltd. ("the Company") recognizes that a workplace founded on dignity, mutual respect and ethical conduct is essential to sustainable organizational growth and institutional credibility.

Sexual harassment undermines not only individual well-being but also organizational integrity, productivity and trust. The Company affirms that the prevention and redressal of sexual harassment is not merely a statutory obligation but a core governance responsibility.

This Policy is guided by the following principles:

1. Dignity and equality of all individuals;
2. Accountability at all levels of the organization;
3. Fairness, neutrality and impartiality in grievance redressal;
4. Protection of rights through due process and adherence to principles of natural justice; and
5. Promotion of a respectful, inclusive and ethical workplace culture

We foster a culture of safety where reporting harassment is supported and protected from retaliation. Our commitment to you includes conducting all investigations with strict confidentiality and sensitivity, while ensuring that any corrective measures are just, balanced and fully aligned with legal standards.

Through this Policy, the Company seeks to integrate statutory compliance with ethical governance, ensuring that workplace safety, dignity and gender justice remain embedded within its institutional framework.

1. Policy Statement

Mobiuso Technologies Pvt. Ltd. ("the Company"), having its registered office at 1st Floor, MTNL Telecom Building, Sector 1, Millennium Business Park, Mahape, Navi Mumbai – 400710, Maharashtra, India, is committed to providing and maintaining a workplace that is professional, safe, inclusive, respectful and free from sexual harassment.

The Company adopts a **zero-tolerance** approach to sexual harassment in any form and affirms its commitment to:

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+91.9323693223 ♦ hr@mobiuso.com

- I. Preventing sexual harassment at the workplace through proactive measures, awareness and sensitisation;
- II. Providing a prompt, accessible and effective grievance redressal mechanism;
- III. Conducting fair, impartial and time-bound inquiries in accordance with the principles of natural justice;
- IV. Ensuring protection against victimisation, retaliation or intimidation; and
- V. Preserving the dignity, privacy and confidentiality of all individuals involved in the process.

Sexual harassment shall be treated as misconduct and shall attract disciplinary action, which may include measures as prescribed under this Policy, the Company's Service Rules and/or HR Policies and/or applicable employment terms, as amended from time to time.

2. Objectives

This Policy is framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("PoSH Act") and the Rules framed thereunder. In the event of any inconsistency between this Policy and the statutory provisions, the provisions of the Act and Rules shall prevail.

The objectives of this Policy are to:

- I. Provide and sustain a safe, secure and respectful workplace environment;
- II. Prevent, prohibit and redress incidents of sexual harassment at the workplace;
- III. Establish a structured, accessible and transparent grievance redressal mechanism;
- IV. Ensure time-bound inquiry processes and effective implementation of recommendations in accordance with applicable law; and
- V. Promote awareness, gender sensitivity, equity, accountability and ethical workplace conduct.

This Policy reflects the Company's commitment to legal compliance, organisational integrity and a culture of respect and inclusion.

3. Scope and Applicability

3.1 Applicability

This Policy shall apply to all people associated with the Company, including but not limited to:

1. **Employees:** Any person employed at the Workplace for any work on a 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 and whether for remuneration or not, whether the terms of employment are expressed or implied. This includes probationers, contractual, part-time and casual employees.
2. **Interns and Trainees:** Interns, trainees, apprentices and students engaged with the Company for training, learning or skill development.
3. **Consultants and Non-Traditional Workers:** Consultants, freelancers, gig workers and individuals engaged in a professional or voluntary capacity, whether paid or unpaid.
4. **Contract Labour and Vendor Personnel:** Individuals employed through contractors, vendors or service providers and working at or in connection with the Workplace.
5. **Third Parties:** Clients, customers, visitors, business associates and any other third party interacting with employees or present at the Workplace.

3.2 Coverage

This Policy extends to and protects any Aggrieved Woman, as defined under the PoSH Act, who alleges sexual harassment in relation to the Workplace, irrespective of whether she is directly employed by the Company or otherwise.

The protections under this Policy shall be available regardless of the nature or duration of association with the Company and shall cover all interactions arising out of or in the course of employment, including those occurring during official travel, off-site meetings, virtual interactions or any work-related engagement.

This Policy ensures a safe, respectful and dignified work environment for everyone. All complaints of sexual harassment will be addressed in a fair, timely and legally compliant manner.

4. Definitions

For the purposes of this Policy, the following terms shall have the meanings assigned below:

4.1 Aggrieved Woman

"An Aggrieved Woman" means a woman of any age, whether employed by the Company or not, who alleges that she has been subjected to sexual harassment at the workplace, in accordance with the PoSH Act.

4.2 Respondent

"Respondent" means a person against whom the aggrieved woman has made a complaint of sexual harassment under this Policy.

4.3 Workplace

"Workplace" shall have the meaning assigned to it under Section 2(o) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and shall be construed broadly to include any place or environment where work-related activities are carried out or which arises out of or in the course of employment.

Without prejudice to the generality of the above, "Workplace" shall include:

- a) The Company's registered office, branch offices, administrative offices and all other business premises;
- b) Client locations, project sites, vendor premises or any other place visited in connection with work;
- c) Work-related travel, whether domestic or international, including accommodation and transportation arranged or provided by the Company;
- d) Conferences, seminars, trainings, workshops and Company-sponsored or work-related events;
- e) Virtual and digital workspaces, including official email systems, collaboration platforms (such as Teams, Zoom, Buzz, etc.) and messaging applications (including WhatsApp, Buzz, or similar platform when used for official or work-related communication;
- f) Work-from-home or remote working environments, including any dwelling place or location used for the purpose of discharging work responsibilities; and

- g) Any place visited by an employee arising out of or during the course of employment, including social or informal interactions that have a nexus with work.

This definition shall be interpreted expansively and purposively to ensure that all work-related environments, whether physical or virtual, are covered under this Policy.

4.4 Internal Committee (IC)

"Internal Committee (IC)" means the committee constituted by the Company in accordance with Section 4 of the PoSH Act, for the purpose of receiving, examining and inquiring into complaints of sexual harassment.

4.5 Management

"Management" means the Employer as defined under Section 2(g) of the PoSH Act and includes the Managing Director, Directors or any officer(s) specifically authorised by the Company who are responsible for the management, supervision and control of the workplace.

5. What Constitutes Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour, whether direct or implied, as defined under the PoSH Act, including but not limited to:

1. Physical contact and advances;
2. A demand or request for sexual favours;
3. Sexually coloured remarks;
4. Showing pornography; or
5. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

An act or behaviour shall be considered "unwelcome" if it is uninvited and causes discomfort, humiliation or distress to the aggrieved woman, irrespective of whether she expressly objected at the time.

The determination of whether conduct constitutes sexual harassment shall be based on the facts and circumstances of each case, with due regard to the impact on the aggrieved woman and not merely the intent of the respondent.

Illustrative Conduct (Including Digital Misconduct)

Sexual harassment may include, but is not limited to, the following conduct:

1. Sending sexually explicit emails, messages, images, videos, memes or other digital content;
2. Making inappropriate comments about a person's body, attire or physical appearance;
3. Engaging in persistent and unwelcome communication of a personal or sexual nature;
4. Making sexual jokes, suggestive remarks or inappropriate innuendos;
5. Stalking, monitoring, cyber harassment or the unauthorised recording or sharing of content of a sexual nature;

Provided that sharing of such material strictly and exclusively with the Internal Committee (IC), in good faith and solely for the purpose of reporting or evidence, shall not constitute a violation of this Policy.

6. Making offensive gestures or engaging in indecent exposure;
7. Repeated invitations or advances despite refusal or clear disinterest;
8. Creating an intimidating, offensive or hostile work environment; or
9. Quid pro quo harassment, where submission to or rejection of sexual conduct is made a basis for employment decisions.

5.1 Circumstances That May Amount to Sexual Harassment

In addition to the above, the following circumstances, if occurring in relation to or in connection with any act or behaviour of sexual harassment, may also amount to sexual harassment:

1. An implied or explicit promise of preferential treatment in employment;
2. An implied or explicit threat of detrimental treatment or adverse employment action;
3. Interference with work performance or creating a hostile work environment; or
4. Humiliating treatment likely to affect the aggrieved woman's health, safety or dignity.

5.2 Interpretation

This provision shall be interpreted broadly and purposively to cover all forms of conduct that undermine the dignity and safety of women at the workplace, including conduct occurring in physical, virtual or hybrid work environments.

The absence of intent to harass shall not be a defence, where the conduct has the effect of violating the dignity of the aggrieved woman or creating a hostile work environment.

6. Internal Committee (IC)

The IC shall function as an independent and impartial body, responsible for ensuring that all complaints are addressed in a fair, objective and time-bound manner, in accordance with the provisions of the PoSH Act and the principles of natural justice.

6.1 Constitution and Composition of Internal Committee (IC)

The Company shall constitute an Internal Committee ("IC") at each administrative unit, office or branch, in accordance with the provisions of Section 4 of the PoSH Act.

6.2 Composition

The IC shall comprise the following members:

1. **Presiding Officer:** A senior-level woman employee employed at the workplace.
2. **Employee Members:** Not less than two (2) members from amongst employees, preferably persons committed to the cause of women or having experience in social work or legal knowledge.
3. **External Member:** One member from a non-governmental organisation or association committed to the cause of women or a person familiar with issues relating to sexual harassment, social work or legal compliance and who is independent and free from any conflict of interest.

At least fifty percent (50%) of the total members of the IC shall be women, in compliance with statutory requirements.

The Company shall ensure that all members of the IC are appropriately trained and sensitized on the provisions of the PoSH Act, principles of natural justice and inquiry procedures, to enable the IC to discharge its functions effectively and impartially.

6.3 Quorum for Inquiry Proceedings

A minimum of three (3) members of the IC, including the Presiding Officer, shall be present for conducting inquiry proceedings. No hearing shall be validly conducted in the absence of the Presiding Officer.

6.4. Tenure

The Presiding Officer and every member of the IC shall hold office for a period not exceeding three (3) years, as stipulated under Section 4(3) of the PoSH Act, from the date of their nomination.

Any vacancy arising in the IC shall be filled promptly by the Company to ensure continuity of proceedings and compliance with statutory requirements.

6.5. Notification and Functioning

The constitution and composition of the IC shall be formally notified and communicated to all employees and displayed at conspicuous places in the workplace, in accordance with applicable law.

The IC shall function as an independent quasi-judicial body, ensuring impartiality, confidentiality and adherence to due process. In discharging its responsibilities, the Committee will be guided by the principles of natural justice, equity and proportionality.

6.6 Roles and Responsibilities of the Internal Committee (IC)

The Internal Committee (IC) shall discharge its functions in accordance with the provisions of the PoSH Act, the Rules framed thereunder and this Policy.

6.6.1 Core Functions of the Internal Committee

The IC shall:

1. Receive and acknowledge complaints of sexual harassment in a timely, sensitive and confidential manner;
2. Provide necessary assistance to the aggrieved woman in filing a written complaint, where required;
3. Conduct fair, impartial and time-bound inquiries with the utmost sensitivity.

4. Ensure that both parties are given a reasonable and equal opportunity to present their case, submit evidence and produce witnesses;
5. Recommend appropriate interim relief measures to safeguard the interests of the aggrieved woman and prevent further harm during the pendency of the inquiry;
6. Maintain strict confidentiality of the identity of the parties, witnesses, proceedings, recommendations and all related information, in accordance with applicable law;
7. Submit a reasoned inquiry report containing findings and recommendations to the Employer and both parties within ten (10) days of the inquiry's completion;
8. Recommend appropriate disciplinary action or corrective measures based on the findings of the inquiry;
9. Maintain proper records of complaints, proceedings, evidence and outcomes and assist the Employer in statutory reporting and compliance;
10. Monitor the implementation of its recommendations by the Employer and report any non-compliance to the appropriate authority, including the Board of Directors / highest governing body and the District Officer, where required under law; and
11. Act with independence, integrity, objectivity and sensitivity while handling all matters under this Policy.

6.6.2. Procedural and Quasi-Judicial Responsibilities

In the discharge of its functions, the IC shall:

1. Adhere strictly to the principles of natural justice, including the right to be heard and the absence of bias ;
2. Conduct proceedings in a manner that is non-intimidating, trauma-informed and respectful of all parties;
3. Base findings on credible evidence and reasoned analysis, without being bound by the strict rules of the Code of Civil Procedure;
4. Ensure inquiries are concluded within the statutory 90-day period as prescribed under the PoSH Act; and
5. Record detailed minutes, observations and reasons forming the basis of their findings and recommendations.

6.6.3. Responsibilities of Individual IC Members

Each member of the IC shall:

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1. Participate in proceedings with objectivity, diligence and through preparedness;
2. Maintain strict confidentiality and professional integrity throughout the inquiry process;
3. Disclose any potential conflict of interest and recuse themselves, where necessary to ensure impartiality;
4. Contribute to the objective evaluation of evidence and the formulation of reasoned findings; and
5. Uphold the dignity, privacy and rights of all parties involved.

6.6.4. Institutional Responsibility of the IC

The IC, as a body, shall ensure that:

1. All proceedings are conducted in a manner that upholds the credibility and fairness of the redressal process
2. The workplace environment remains safe, respectful and free from retaliation for the complainant and witnesses during and after the inquiry; and
3. Its functioning reflects the Company's commitment to legal compliance, ethical conduct and gender justice.
4. The IC is committed to handling all complaints with seriousness and sensitivity, functioning as a trusted body that ensures accountability and fairness.

6.7 Powers of the Internal Committee

For the purposes of conducting an inquiry, the IC shall have the same powers as are vested in a civil court, the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:-

1. Summoning and enforcing the attendance of any person and examining such person on oath;
2. Requiring the discovery and production of documents; and
3. Any other matter as may be prescribed under applicable law.

6.8 Removal of IC

The Company may remove and replace any member of the Internal Committee in accordance with Section 4(5) of the PoSH Act where such member:

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1. Contravenes confidentiality obligations under the Act;
2. Has been convicted of an offence or disciplinary misconduct;
3. Is found guilty in disciplinary proceedings; or
4. Has abused their position so as to render continuance prejudicial to public interest.

7. Responsibilities of Employees

The Company recognises that the creation and sustenance of a safe, respectful and inclusive workplace is a shared responsibility. All employees are expected to uphold the highest standards of professional conduct, dignity and mutual respect in all workplace interactions.

7.1 General Responsibilities of All Employees

All employees shall:

1. Maintain professional and appropriate conduct at all times, including during workplace interactions, official travel, virtual engagements, client interactions and Company-sponsored events.
2. Treat colleagues, subordinates, supervisors, clients and third parties with dignity, courtesy and respect at all times.
3. Be mindful that verbal, non-verbal, physical or digital conduct, if unwelcome, may cause discomfort or create a hostile work environment.
4. Exercise care, sensitivity and professionalism in all forms of communication, including emails, messages, social media interactions and informal conversations connected to the workplace.
5. Co-operate in good faith with the Internal Committee (during any inquiry process, including providing truthful, complete and accurate information.
6. Maintain strict confidentiality and respect the privacy of all individuals involved in a complaint and refrain from discussing or disclosing details of ongoing proceedings.
7. Refrain from engaging in any form of victimisation or retaliation, including but not limited to social exclusion, unjustified changes in roles or responsibilities or adverse performance evaluations not based on objective work output.
8. Promptly report concerns or incidents of sexual harassment to the Internal Committee or appropriate authority, where they feel safe and comfortable to do so.
9. Actively participate in awareness, sensitisation and training programs conducted by the Company under the PoSH framework.

10. Refrain from encouraging, condoning or participating in any conduct that demeans, mocks or belittles any individual and contributes to fostering a respectful and inclusive workplace culture.
11. Act as responsible bystanders and where appropriate, discourage or report conduct that may be inconsistent with this Policy.
12. Ensure that digital and virtual interactions are conducted in a manner consistent with workplace standards of dignity and professionalism.
13. Avoid misuse of authority, influence or position in any manner that may lead to inappropriate conduct or perceived coercion.
14. Uphold the Company's commitment to non-retaliation, inclusivity and ethical workplace always.

Failure to adhere to the above responsibilities may constitute misconduct and may invite disciplinary action in accordance with the Company's Service Rules and applicable law.

8. Responsibilities of Managers / Supervisors

Managers and supervisors play a critical leadership role in fostering and sustaining a workplace that is respectful, inclusive and free from sexual harassment. In addition to their responsibilities as employees, they shall discharge the following obligations:

1. Promote and maintain a professional, inclusive and safe work environment, free from inappropriate conduct.
2. Lead by example by demonstrating respectful behaviour in all professional interactions.
3. Address all sexual harassment concerns with immediate seriousness and sensitivity. Serve as the first point of contact for team members, providing appropriate guidance toward the Internal Committee (or designated authority).
4. Refrain from attempting to informally resolve complaints that fall within the scope of this Policy and shall not pressure or influence any person to "settle," withdraw or ignore a complaint.
5. Ensure that no employee under their supervision is subjected to retaliation, victimisation, adverse treatment or disadvantage for raising concern or participating in any proceedings under this Policy.
6. Co-operate fully with the Internal Committee during inquiry, including providing relevant information, documents or assistance as required.
7. Refrain from influencing, interfering with or attempting to affect the inquiry process or its outcome, directly or indirectly.

8. Promptly report to the Internal Committee or Human Resources (any incident or concern of sexual harassment that comes to their knowledge, even in the absence of a formal complaint.
9. Maintain strict confidentiality of all information relating to sexual harassment complaints and ensure that such information is disclosed only to persons officially involved in the inquiry process.
10. Ensure that any performance evaluation, disciplinary action or managerial decision is based solely on objective work performance, supported by proper records and is not influenced by or perceived as retaliation for an employee's involvement in any proceedings under this Policy.
11. Ensure that their teams are aware of this Policy and actively participate in sensitisation and training initiatives conducted by the Company.
12. Take proactive steps to prevent inappropriate conduct, including addressing early signs of misconduct and reinforcing acceptable workplace behaviour.
13. Uphold and reinforce the Company's commitment to fairness, accountability, non-retaliation, inclusivity and ethical workplace conduct at all times.

Failure to adhere to the above responsibilities may constitute serious misconduct and may invite disciplinary action in accordance with the Company's Service Rules and applicable law.

9. Employer Responsibilities

The Company, through its Management, shall fulfil its obligations under Section 19 of the PoSH Act and this Policy. The Employer shall ensure a proactive, compliant and accountable framework for the prevention and redressal of sexual harassment at the workplace.

In particular, the Employer shall:

1. Provide and maintain a safe, secure and inclusive working environment that promotes dignity, equality and respect for all individuals.
2. Treat acts of sexual harassment as misconduct under the Company's Service Rules / HR Manual and initiate appropriate disciplinary action.
3. Constitute, notify and ensure the effective functioning of the Internal Committee (in accordance with statutory requirements.
4. Display, at conspicuous places in the workplace, the penal consequences of sexual harassment and the composition of the Internal Committee, as required under law.
5. Provide necessary facilities, administrative support and resources to enable the IC to discharge its functions effectively.

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6. Extend full cooperation to the IC by ensuring the attendance of the complainant, respondent and witnesses. The Employer shall facilitate immediate access to all relevant records, including physical documents, electronic data and CCTV footage, required for a fair and effective inquiry.
7. Act upon the recommendations of the IC in a timely manner and implement the same within the prescribed statutory period of sixty (60) days;
8. Provide appropriate assistance to the aggrieved woman in filing a complaint with law enforcement authorities, where the alleged conduct constitutes an offence under applicable law;
9. Ensure that no person is subjected to retaliation, victimisation or adverse consequences for filing a complaint, supporting a complainant or participating in an inquiry. Furthermore, ensure that any performance evaluation or disciplinary action remains strictly objective, supported by documented records and is not retaliatory in nature.;
10. Maintain strict confidentiality of complaints, proceedings and outcomes, in accordance with the provisions of the Act;
11. Conduct regular awareness and sensitisation programs for employees and capacity-building programs for members of the IC;
12. Maintain and include details of complaints and their disposal in the annual report submitted to the District Officer, as required under the Act;
13. Periodically review and monitor the implementation of this Policy to ensure continued compliance, effectiveness and alignment with legal requirements.

9.1 Statutory Reporting and Digital Compliance

The Employer shall ensure compliance with statutory reporting and digital governance requirements, including:

1. **Annual Report (District Officer):** Submission of a detailed annual report to the District Officer by 31st January each year, including particulars of complaints received, disposed of, pending and details of awareness programs conducted.
2. **Board's Report Disclosure:** Inclusion of a summary of complaints and actions taken in the Company's Annual Report / Board's Report, in accordance with applicable corporate governance requirements.
3. **Nodal Officer Appointment:** Designation of a Nodal Officer responsible for managing the Company's compliance obligations under the PoSH framework, including digital reporting requirements.
4. **SHe-Box Portal Compliance:** Ensuring that the Company's details, IC composition, training records and statutory disclosures are accurately maintained and regularly

updated on the SHe-Box portal, where applicable / as may be mandated by Government notifications from time to time

The Employer shall ensure that all measures under this Policy are implemented in a manner that reflects the Company's commitment to legal compliance, transparency, accountability and a safe and respectful workplace environment.

10. Complaint Mechanism

An aggrieved woman may make a complaint of sexual harassment in accordance with the procedure set out below, in line with the provisions of the PoSH Act and the Rules framed thereunder.

10.1 Time-Limit

The complaint shall be made in writing within three (3) months from the date of the incident.

1. In the case of a series of incidents, the complaint shall be made within three (3) months from the date of the last incident.
2. The Internal Committee may, for reasons to be recorded in writing, extend the time limit by a further period not exceeding three (3) months, if it is satisfied that circumstances prevented the complainant from filing the complaint within the prescribed period.

10.2 Assistance in filing a complaint

1. Where the complaint is made orally, the Internal Committee shall provide reasonable assistance to the aggrieved woman in reducing the complaint to writing and duly signed by the complainant.
2. Where the aggrieved woman is unable to make a complaint on account of physical or mental incapacity or in the event of her death, the complaint may be made by her legal heir or such other person as prescribed under the PoSH Act and Rules.

10.3 Mode of Submission

Complaints may be submitted through any of the following channels:

1. **Physical Submission:** Six (6) copies of the written complaint, along with supporting documents (if any), may be submitted in a sealed envelope addressed to the Presiding Officer of the IC;
2. **Digital Submission:** By email to the designated PoSH email ID: posh-ic@mobiuso.com;
3. **Government Portal:** Through the SHe-Box portal of the Government of India (<https://shebox.wcd.gov.in/>), where applicable, which shall be routed to the Company's Internal Committee.

10.4 Format of complaint

While a standard format is provided in Annexure I for guidance, the IC will accept any written complaint that provides sufficient details such as the description of the incident, date (and identity of the parties involved, to initiate a fair and effective inquiry.

10.5 Acknowledgment and Initial Response

The IC shall acknowledge receipt of the complaint within a reasonable timeframe (preferably within 3–5 working days).

The IC shall, at the earliest, inform the aggrieved woman of her rights under the Act, including the option of conciliation (where appropriate), the inquiry process and availability of interim relief measures.

11. Conciliation

Conciliation is an optional and voluntary mechanism available to the aggrieved woman for resolving a complaint of sexual harassment, in accordance with Section 10 of the PoSH Act and shall be conducted subject to the following:

1. Conciliation may be initiated only upon a written request made by the aggrieved woman and prior to the commencement of a formal inquiry by the Internal Committee (IC).
2. Upon receipt of such request, the IC may facilitate a fair and neutral conciliation process, without exerting any pressure on either party to arrive at a settlement.
3. No monetary settlement shall be made as a basis of conciliation.
4. Where a settlement is arrived at, the IC shall record the terms of settlement in writing, duly signed by both parties and provide copies to the aggrieved woman and the respondent.

5. The IC shall forward the settlement terms to the Employer for implementation and upon such settlement, no further inquiry shall be conducted, unless there is a breach of the agreed terms.
6. In the event of a breach of the settlement terms by the respondent or upon a written request by the aggrieved woman, the IC shall proceed to conduct a formal inquiry in accordance and Best Practice Integration.
7. The conciliation process shall be conducted in a confidential, respectful and non-coercive manner, ensuring that the consent of the aggrieved woman is free, informed and voluntary.
8. The IC shall ensure that conciliation is not used as a means to trivialise the complaint or bypass due process, particularly in cases involving serious allegations.
9. The IC may, where appropriate, advise the aggrieved woman of the implications of conciliation, including the closure of inquiry upon settlement.
10. The terms of settlement shall be clear, specific, lawful and capable of implementation and may include non-monetary corrective measures such as written apology, undertaking of good conduct, behavioral commitments or other appropriate remedies.
11. The Employer shall ensure timely implementation and monitoring of the settlement terms and report compliance to the IC.
12. The IC shall maintain proper records of conciliation proceedings and outcomes, in accordance with statutory and organizational requirements.

Conciliation under this Policy is intended to provide a voluntary and structured avenue for resolution, while safeguarding the rights, dignity and interests of the aggrieved woman.

12. Interim Relief

During the pendency of the inquiry and upon a written request made by the aggrieved woman, the Internal Committee may recommend to the Employer appropriate interim measures in accordance with Section 12 of the PoSH Act to ensure a safe, secure and non-hostile work environment.

Such measures may include, but are not limited to:

1. Transfer of the aggrieved woman or the respondent to another workplace or location;
2. Grant of leave to the aggrieved woman for a period not exceeding three (3) months, which shall be treated as special leave, in addition to and not deducted from her regular leave entitlement;
3. Temporary modification of reporting relationships, roles or work assignments, to minimize interaction between the parties;

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4. Restraining the respondent from contacting, communicating or approaching the aggrieved woman, directly or indirectly, including through digital or third-party channels;
5. Provision for remote working arrangements, flexible work schedules or alternate seating arrangements, where feasible; or
6. Any other appropriate interim relief as may be deemed necessary by the IC, based on the facts and circumstances of the case.

The IC shall ensure that such recommendations are proportionate, non-punitive in nature and aimed solely at safeguarding the interests of the aggrieved woman and maintaining the integrity of the inquiry process.

The Employer shall implement the recommendations of the IC in a timely manner and ensure that such measures do not result in any disadvantage, stigma or adverse impact on the aggrieved woman's employment conditions.

The Company shall also ensure strict protection against retaliation or victimization of any party or witness during the pendency of the inquiry and shall maintain confidentiality of all such interim measures.

13. Inquiry Procedure

Upon receipt of a complaint and where conciliation is not opted for or has failed, the Internal Committee shall initiate an inquiry in accordance with Section 11 of the PoSH Act and the following procedure:

1. The IC shall conduct the inquiry in accordance with the principles of natural justice, ensuring fairness, impartiality and due opportunity to both parties.
2. Both the aggrieved woman and the respondent shall be given a reasonable and equal opportunity to present their case, submit written statements, produce relevant evidence and examine witnesses.
3. Within seven (7) days of receipt of the complaint, the Internal Committee shall provide the respondent with a copy of the complaint and all supporting documents and shall grant the respondent a reasonable opportunity to submit a written response within ten (10) days, along with any supporting evidence and list of witnesses.
4. The IC may conduct separate hearings with the parties and witnesses, where required, to ensure a non-intimidating and fair environment and shall maintain proper records of all proceedings.
5. The inquiry shall be conducted in a confidential, sensitive and non-adversarial manner, ensuring that the dignity and privacy of all parties are protected at all times.

6. The IC may call for and examine relevant documents, electronic records, CCTV footage or any other material evidence and may exercise powers of a civil court as provided under the Act.
7. The inquiry shall ordinarily be completed within ninety (90) days of the date of receipt of the complaint.
8. Upon completion of the inquiry, the IC shall prepare a reasoned report of its findings, based on standard of proof, preponderance of probabilities and submit the same to the Employer within ten (10) days. Copies of the report shall be made available to both parties, in accordance with the Act.
9. The parties shall not be permitted to be represented by legal practitioners during the inquiry proceedings, unless otherwise required under applicable law.
10. The IC shall ensure that no undue delay occurs in the conduct of proceedings and may regulate its own procedure in a manner consistent with the Act and this Policy.
11. The IC shall ensure that all proceedings are properly documented, including statements, evidence, and minutes of hearings, forming part of the official record.
12. The Company shall ensure that no retaliation, victimization or adverse action is taken against any party or witness during the pendency of the inquiry.

This procedure is designed to ensure that inquiries are conducted in a manner that is fair, transparent, time-bound and legally compliant, while safeguarding the rights, dignity and interests of all parties involved.

14. Action on Inquiry Report

1. Upon receipt of the inquiry report from the Internal Committee (IC), the Employer shall act upon the recommendations in accordance with Section 13 of the PoSH Act, within a period of sixty (60) days from the date of receipt of the report;
2. Where the IC concludes that the allegation of sexual harassment has been proved, it shall recommend appropriate disciplinary action and/or compensation, in accordance with the applicable Service Rules, terms of employment and statutory provisions;
3. Sexual harassment shall constitute misconduct under this Policy and the applicable employment framework and shall attract disciplinary action proportionate to the gravity of the misconduct;
4. Where the IC concludes that the allegation has not been proved, it shall recommend closure of the complaint, without prejudice to the rights of the parties under applicable law;
5. The Employer shall ensure that the recommendations of the IC are implemented in a fair, consistent and non-discriminatory manner and that both parties are informed of the action taken.

15. Disciplinary Action

Depending on nature, severity and impact of the misconduct, disciplinary action may include, but is not limited to:

1. Written apology;
2. Warning, reprimand or censure;
3. Withholding of promotion, increment or benefits;
4. Suspension from service;
5. Deduction from salary or wages as compensation to the aggrieved woman;
6. Termination of employment or engagement;
7. Mandatory counselling, sensitisation or training; or
8. Any other corrective, remedial or proportionate measure deemed appropriate under the circumstances.

All disciplinary actions shall be documented and supported by reasoned justification, ensuring consistency with the principles of natural justice.

15.1 Resignation During Pendency of Inquiry

If a respondent seeks to resign during the pendency of a sexual harassment inquiry:

Subject to applicable employment terms, service rules and governing law, the Company may, at its discretion, decline to accept the resignation until the inquiry is completed and a final decision is made; or

The Company may accept the resignation subject to the condition that the inquiry proceedings shall continue and may withhold issuance of the relieving letter and release discretionary end-of-service benefits (including bonuses, incentives or ex-gratia until the conclusion of the inquiry;

Where the respondent is found guilty, the outcome may be recorded as "Dismissal for Misconduct", irrespective of any prior resignation tendered.

The Employer shall ensure that such measures are undertaken in accordance with applicable law and principles of fairness.

15.2 Compensation

Where the IC, upon completion of the inquiry, recommends payment of compensation to the aggrieved woman, the same shall be determined in accordance with Section 15 of the PoSH Act, taking into consideration:

1. The mental trauma, pain, suffering and emotional distress caused;
2. The loss of career opportunity resulting from the incident;
3. Medical expenses incurred for physical or psychiatric treatment;
4. The income and financial status of the respondent; and
5. The feasibility of payment, whether in lump sum or in instalments.

The IC shall record reasoned findings while recommending compensation, ensuring that the amount is fair, proportionate and supported by the material on record.

15.3. Implementation of Compensation

Upon such recommendation, the Employer / Disciplinary Authority shall effect recovery and disbursement of compensation in accordance with applicable Service Rules and statutory provisions, including deduction from salary or such other lawful means as may be permissible.

This framework ensures that actions arising from inquiry findings are timely, proportionate, enforceable and aligned with statutory requirements, while upholding the principles of fairness, accountability and workplace justice.

16. False or Malicious Complaints

Where the Internal Committee, upon completion of the inquiry, concludes that:

- the complaint has been made with malicious intent; or
- the complainant or any witness has knowingly made false statements or produced forged, fabricated or misleading evidence,

The IC may, in accordance with Section 14 of the PoSH Act, record its findings with reasons and recommend initiation of action against such person under the applicable Company Service Rules.

Upon such recommendation, the matter shall be referred to the Human Resources (/ Disciplinary Authority, which shall undertake appropriate disciplinary proceedings in accordance with the Company's Service Rules and/or Code of Conduct.

16.1 Safeguard Against Misuse

No action shall be recommended under this provision merely on account of:

- inability to substantiate a complaint; or
- lack of sufficient evidence to prove the allegations.

The IC shall ensure that malicious intent is clearly established through cogent evidence before making any recommendation. A complaint that is not proved or is unsubstantiated shall not, in itself, be treated as false or malicious.

16.2 Consequences

Where, upon due disciplinary proceedings by HR / the Competent Authority, the allegation of malicious or false complaint is established, appropriate action may be taken, including warning, censure, adverse appraisal entry, withholding of increments/promotion, suspension or termination, depending upon the gravity of the misconduct.

This provision shall be applied sparingly and with due caution, so as not to discourage or deter genuine complainants from reporting incidents of sexual harassment.

17. Confidentiality

The Company, the Internal Committee, all parties to the complaint and witnesses shall maintain strict confidentiality in respect of all matters arising out of proceedings under this Policy, including but not limited to:

1. The identity and address of the aggrieved woman, respondent and witnesses;
2. The contents of the complaint;
3. Statements, submissions, documents and evidence produced during the inquiry proceedings;
4. The recommendations of the Internal Committee; and
5. The action taken by the Employer.

No person shall publish, communicate, disclose or make known any such information to any third party, whether orally, in writing, electronically, through social media, messaging platforms or by any other means, except where disclosure is:

1. required for the purpose of conducting the inquiry or implementing the recommendations of the Internal Committee;
2. required under any legal or statutory obligation;
3. made to competent authorities, legal advisors or law enforcement agencies on a need-to-know basis; or
4. otherwise permitted under applicable law.

Disclosure of the outcome or action taken in relation to a complaint of sexual harassment may be made without disclosing the name, address, identity or any particulars which may lead to the identification of the aggrieved woman, respondent or witnesses.

Any breach of confidentiality shall constitute misconduct and may attract disciplinary action in accordance with the Company's Service Rules / HR Policies and consequences under applicable law.

17.1 Breach of Confidentiality

Any unauthorized disclosure or breach of confidentiality by any person involved in the process shall constitute serious misconduct under the Company's Service Rules and/or Code of Conduct.

Such breach may also attract consequences under applicable law, in addition to disciplinary action under Company policy, which may include warning, censure, adverse service record, suspension or termination of employment, depending on the gravity of the breach.

The Company shall ensure that confidentiality is preserved throughout the process to protect the dignity, privacy and rights of all individuals involved.

18. Zero Tolerance for Sexual Harassment and Retaliation

The Company enforces a zero-tolerance policy regarding sexual harassment. We strictly prohibit retaliation, victimisation or intimidation against:

- The aggrieved woman;
- The respondent;

MOBIUSO TECHNOLOGIES INDIA PRIVATE LIMITED

CIN U72300MH2012PTC228640

Regd.Off: 1ST FLOOR MTNL TELECOM BUILDING ♦ SECTOR 1 MILLENNIUM BUSINESS PARK ♦ MAHAPE ♦ NAVI MUMBAI 400710 ♦

+91.9323693223 ♦ hr@mobiuso.com

- Any witness; and
- Members of the Internal Committee

18.1 Prohibition of Retaliation

Retaliation refers to any direct or indirect adverse action, discrimination or unfair treatment taken against an individual on account of their participation in proceedings under this Policy, whether as a complainant, respondent or witness.

The Company expressly prohibits all forms of retaliatory conduct, including but not limited to:

- **Unjustified changes:** Punitive alterations to workload, responsibilities or job functions;
- **Social isolation:** Social exclusion, marginalisation or deliberate non-cooperation by colleagues or supervisors;
- **Harassment:** Threats, coercion, bullying or any form of cyber-harassment;
- **Biased evaluations:** Adverse performance reviews not based on documented, objective work performance; and
- **Hostile environment:** Any other conduct that creates an intimidating, hostile or adverse work environment.

18.2 Consequences of Retaliation

Any act of retaliation shall constitute serious misconduct under the Company's Service Rules and/or Code of Conduct. Such conduct will invite strict disciplinary action, which may extend to termination of employment, depending on the severity and impact of the misconduct.

Disciplinary action may include a written warning, adverse entry in the Service Record/Personal File, withholding of increments or promotion, suspension, or termination, as deemed appropriate.

Where the act of retaliation also constitutes a violation of applicable law, the Company reserves the right to initiate legal proceedings in addition to internal disciplinary action.

The Company shall take immediate interim measures to protect affected individuals during the pendency of inquiry, including role reassignment, reporting line changes or leave provisions.

Proven retaliation may be considered an aggravating factor while determining penalties in the underlying PoSH complaint.

The Company will ensure confidential handling and prompt redressal of retaliation complaints through the appropriate authority.

19. Right to Appeal

Any person aggrieved by the following actions or decisions under this Policy may prefer an appeal in accordance with Section 18 of the PoSH Act:

1. Findings or recommendations of the Internal Committee following an inquiry;
2. Recommendations relating to false or malicious complaints or false evidence;
3. Action taken for breach of confidentiality under this Policy or applicable law; or
4. Non-implementation of the recommendations of the Internal Committee by the Employer within the prescribed time.

19.1 Appellate Authority

Such appeal shall lie before the appropriate Court, Tribunal or Appellate Authority having jurisdiction under the applicable service rules or governing law.

19.2 Time Limit

The appeal shall be preferred within ninety (90) days from the date of the recommendation, decision or non-implementation complained of.

19.3 Procedure

The appeal shall be made in writing and shall contain the grounds of challenge along with copies of the relevant findings, recommendations or supporting documents relied upon by the appellant.

The appeal shall be filed and processed in accordance with the procedure prescribed by the applicable Appellate Authority or governing law.

This clause shall be read in conjunction with the provisions of the PoSH Act and the Rules framed thereunder.

Prevention Of Sexual Harassment (POSH) Policy



Issued by: Mobiuso Management
Effective date: February 24, 2026

Processes, Policies & Guidelines

19.4 Saving Clause

Nothing contained in this Policy shall preclude the aggrieved woman or the Company from initiating or pursuing remedies under any other applicable law, including civil or criminal proceedings, as may be warranted.

DECLARATION

This Policy is approved by the Board of Directors / Management of Mobiuso Technologies Pvt. Ltd. and shall come into effect from the effective date mentioned herein.

The Company reserves the right to amend, modify or review this Policy from time to time in accordance with applicable law.

Authorized Signatory
Mobiuso Technologies India Pvt. Ltd.



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