

Document Title	Policy on Prevention, Prohibition and Redressal of Sexual Harassment
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Contact	HR Team
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Version History

Version	Date	Description
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1.0	15-Oct -2023	Updated the Committee Members
1.1	01-Nov-2024	Updated the Committee Member
1.2	01-Sep- 2026	Updated the Policy & the Committee Members

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1. Objective

Knack Systems (hereinafter referred to as "Company") is committed to conducting and governing ourselves with ethics, transparency and accountability and to this, we have developed governance structures, practices and procedures that ensures that ethical conduct at all levels is promoted across our value chain. It is thus in acknowledgement and consonance with these values, which we are dedicated to ensuring that the work environment at all our locations is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the employees of the Organization. We also strive to guarantee a safe and welcoming environment to all those who visit our locations in any capacity, such as customers, vendors etc. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that employees of the Company do not engage in any practices that are abusive in any form or manner whatsoever.

The Company therefore aims to adopt and implement this **"Policy on Prevention, Prohibition and Redressal of Sexual Harassment"** (hereinafter "POSH Policy") to provide a safe working environment and to prohibit any form of sexual harassment. This Policy therefore, intends to prohibit such occurrences and also details procedures to follow when an employee believes that a violation of the Policy has occurred within the scope of all applicable regulations regarding Sexual Harassment.

Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of Policy.

All managers are to ensure that they themselves as well as their team, including new joiners, are aware of POSH Policy in place and strictly adhere to it.

Company will promptly investigate all complaints and take appropriate action up to and including termination of contract/employment.

Acronyms

HR - Human Resources

RM - Reporting Manager

RC - Redressal Committee

2. Applicability

This Policy will extend to all employees of the Company (in India) including those employed on direct and indirect contract basis irrespective of their employment status, designation, work location or mode of working, including employees working from the Company's office premises, from home or any other remote location. The Policy also extends to those who are not employees of the Company, such as customers, vendors, suppliers, visitors etc., but are subjected to sexual harassment at the premises (defined hereinafter) of the Company.

The Policy also extends to remote and virtual work environments and work-related digital interactions, including but not limited to communication through email, instant messaging platforms, collaboration tools, video/audio conferencing platforms, virtual meetings, chats and other electronic or digital communication channels used in connection with employment. Any unwelcome conduct of a sexual nature occurring through or in connection with such work-related virtual or digital interactions shall be covered under this Policy and may be dealt with in accordance with the applicable provisions of the POSH Act, 2013.

3. Scope

The scope of the Policy shall extend to all employees as well as direct and indirect contractors. The term “workplace” shall be interpreted broadly to include not only physical locations but also remote and virtual work environments and shall include conduct occurring in the following contexts:

- Business locations of the Company in India
- Any external location visited by employees due to or during the course of their employment with the Company such as business locations of other Companies/entities, guest houses hotels, conferences, training venues, and similar locations.
- Any mode of transport provided by the Company (or a representative of the Company) for undertaking a journey to and from aforementioned locations.
- Any remote or work-from-home arrangement, including the employee’s residence or any other location from which the employee is performing official duties
- Any virtual or digital work environment, work from home, remote working including but not limited to email communication, instant messaging platforms, collaboration tools, video/audio conferencing platforms, virtual meetings, online training sessions, work-related chats, and any other electronic or digital communication channels used in connection with employment.

Without prejudice to the rights of an employee in relation to the above the scope includes, any complaint raised specifically by an employee of the Company due to being subjected to any act of sexual harassment by another employee of the Company at

- any location, including but not limited to the private residences of the aggrieved employee, or
- in any mode of transport, or
- any remote, virtual or digital work environment as described above.

4. Definitions

"Sexual Harassment" includes any unwelcome sexually determined behaviour (direct or implied) such as physical contact and advances, unwelcome communication or invitations, demand or request for sexual favours, sexually intended remarks, showing pornography, creating a hostile work environment or any other unwelcome "sexually determined behaviour" (physical, verbal or nonverbal conduct) of a sexual nature.

"Sexual Harassment" would also mean:

- Quid pro quo sexual harassment, which means something in return or an exchange of one thing for another

- In the workplace, quid pro quo sexual harassment takes place if sexual favours are asked in exchange for any kind of special treatment on the job. Threatening an employee if he/she does not consent to any such sexual advances or favours also amounts to sexual harassment. The act of 'asking' may either be verbal or implied and the 'sexual conduct' may be verbal or physical. But, in either case, it must be unwelcome.
- For eg: Direct or implied requests or offers by any employee for sexual favours in exchange for actual or promised job benefits such as favourable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

→ Hostile work environment includes

- Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more employees,
- Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals,
- It will also mean related retaliation which includes marginalizing someone in the workplace with regard to his / her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim.

→ Virtual/Remote Workplace includes

- A virtual or remote workplace refers to any work-related environment or interaction that takes place through digital, electronic or online means, including virtual meetings, video or audio conferences, email, instant messaging platforms, collaboration tools, work-related chats and other communication channels including remote working or work from home situations used in connection with employment, irrespective of the physical location of the employee.
- Accordingly, unwelcome conduct of a sexual nature occurring through or in connection with such remote, virtual or digital work environments may constitute sexual harassment and shall be dealt with in accordance with this Policy and the applicable provisions of the POSH Act, 2013.

This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list. The determination of whether any particular conduct constitutes sexual harassment shall be made based on the facts and circumstances of each case and in accordance with the applicable provisions of the POSH Act, 2013.

In countries where local laws / regulations have clearly defined 'sexual harassment' and procedure to address any complaint relating to it, the interpretation of 'sexual harassment' & the investigation procedures shall be guided in accordance with the local laws / regulations as applicable.

5. Preventive Action

The Company will take reasonable steps to ensure prevention of sexual harassment at work which may include circulating applicable policies and other relevant information to all employees, including to all new joiners.

6. Redressal Committee

The Company will have a centralized Redressal Committee with a representation across all Company locations, to specifically address any complaints of sexual harassment. The committee will be nominated by the appropriate HR Head and would be headed by a woman employee who is fairly a senior person who can rationally head the redressal in an unbiased and unprejudiced manner.

The committee shall also consist:

- I. Chairperson – a nominated female employee at a senior level
- II. Not less than two members nominated from amongst employees
- III. One member from non-governmental organisation or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- IV. At least one-half of the total Members so nominated shall be women.

Please note that the Presiding Officer and every member of the Redressal Committee shall hold office for three years, from the date of their nomination specified by the employer. The Member appointed from the non-governmental organisation or associations shall be paid fees or allowances for holding the proceedings of the Internal Committee, by the employer, as may be prescribed.

To convene any formal proceeding, enquiry, or hearing, a strict quorum of at least three (3) Committee members is mandatory, including the compulsory presence of the Presiding Officer.

Prior to initiating an enquiry into any case, every Committee member must sign a formal Conflict of Interest declaration.

The Redressal Committee functions as a quasi-judicial body and is vested with Civil Court powers under the Code of Civil Procedure, 1908, for summoning witnesses, examining persons on oath, and compelling the production of documents and evidence.

Inclusion or removal of committee members would be approved by HR Head. In addition to handling complaints of sexual harassment, committees will also coordinate preventive activities to create a sexual harassment free atmosphere via:

- Common info mailers, and
- Floating Articles on the same, from time to time.

The committee members, HR and reporting managers will be provided necessary training inputs to handle such issues effectively and with the required sensitivity and concern.

7. Procedure for dealing with complaints

7.1. Filing of a complaint

If any employee believes that she/he has been subjected to sexual harassment, such person may file a complaint with any member of the committee or send an email to **poshcommittee@knacksystems.com** or submit the complaint online via the official She-Box Portal (**<https://shebox.wcd.gov.in/>**).

The committee member(s) on receiving a complaint will inform the other committee members. The committee head should arrange for a meeting within one week of receipt of the complaint for discussing the complaint raised.

An aggrieved woman may make a written complaint **within 3 months from the date of the incident**, or in case of a series of incidents, within 3 months from the date of the last incident. The IC may extend this period by **another 3 months** if it is satisfied that circumstances prevented the woman from filing within the initial period

Every attempt will be made to get the complainant to provide the complaint in writing. The complaint shall include the circumstances giving rise to the complaint, the dates of the alleged occurrences, and names of witnesses, if any. The Complaint shall be signed by the complainant.

Anonymous complaints do not constitute formal complaints under the POSH Act, 2013; however, HR may evaluate such information for internal administrative action as appropriate. When the aggrieved employee is unable to make a complaint on account of her/his physical or mental incapacity or death or otherwise, her/his legal heir or such other person as may be prescribed may make a complaint within 3 months (extendable by up to 3 additional months) of the incident.

If the complaint does not rise to the level of sexual harassment, the committee may determine to dismiss the complaint without further investigation and the same shall be communicated to the employee in writing. Appropriate action will be taken by the committee with the employee who made the false complaint.

Failure to substantiate a complaint or provide sufficient evidence shall not, by itself, attract any action against the complainant. Where, after due inquiry, the Internal Committee concludes that the complaint was maliciously made or that the complainant knowingly made a false complaint or produced forged or misleading documents or evidence, appropriate action will be taken by the committee in accordance with the POSH Act, 2013 and the applicable Rules.

7.2. Process of Enquiry

- The Committee will ask the complainant to prepare a detailed statement of incidents/allegations. The Statement of allegations will be shared with the accused.
- The accused will be asked to prepare a response to the statement of allegations and submit to the committee within the given time.
- The statements and other evidence obtained in the inquiry process will be considered confidential.
- The committee will organize verbal hearings with the complainant and the accused separately. A joint meeting can be arranged if required as deemed by the committee or if one of the parties requests for the same.

- The Committee will take testimonies of other relevant persons and review the evidence wherever necessary. The committee should ensure that sufficient care is taken to avoid any retaliation against the witnesses.
- During the inquiry process, the complainant and the accused would be expected to refrain from any form of threat, intimidation or influencing of witnesses.
- The committee will conduct the enquiry in accordance with the principles of natural justice. Direct cross-examination between the parties is strictly prohibited. All cross-examination questions must be submitted in writing to the Committee, which will put them to the respective party or witness. Legal practitioners are strictly barred from representing either party during the proceedings. If a party fails to attend three consecutive hearings without sufficient cause, the Committee shall have the right to terminate the enquiry or pass an ex-parte decision, provided a 15-day advance written show-cause notice is served.
- The committee will arrive at a decision after carefully and fairly reviewing the circumstances, evidence and relevant statements.
- The committee will ensure confidentiality during the inquiry process and will ensure that in the course of investigating a complaint:
 - Both parties will be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents;
 - Upon completion of this investigation, both parties will be informed of the results of the investigation.
- The committee will be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment. In this regard the committee will also have the discretion to make appropriate interim recommendations in relation to an accused person (pending the outcome of a complaint) including , transfer, leave, change of work location or restraining the respondent from evaluating the complainant's performance appraisal etc.,
- The investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances
- The committee will investigate and prepare an enquiry report as prescribed in Annexure III with recommendations within ninety (90) days from the date of receipt of the complaint, and shall issue the final enquiry report within ten (10) days of completion to the Employer and both parties.

7.3. Decision and Action

Once the investigation is completed, the internal committee shall determine the validity of the allegations and decide the appropriate disciplinary action and/or financial compensation. The Head HR shall have no role in determining or deciding the punishment and shall be strictly responsible for implementing and executing the decision of the Committee.

Where the Committee concludes that the allegations against the respondent are proven, it shall decide upon one or more of the following penalties:

Disciplinary Sanctions:

- Written apology
- Warning
- Reprimand or censure
- Loss of promotion
- Loss of pay hike
- Termination from service
- Counselling
- Community service

Financial Penalty & Victim Compensation: Direct the deduction of a specified sum from the salary or wages of the respondent to be paid as financial compensation to the aggrieved woman or her legal heirs.

Criteria for Compensation Determination: The quantum of compensation determined by the Committee shall be calculated based on:

- The mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman;
- The loss in career opportunity due to the incident of sexual harassment;
- Medical expenses incurred by the victim for physical or psychiatric treatment;
- The income and financial status of the respondent;
- The feasibility of payment in a lump sum or in instalments

Direct Recovery: If deductions cannot be made from the respondent's salary due to unpaid leave, or termination of employment, the Committee shall direct the respondent to pay the compensation amount directly to the aggrieved woman or her legal heirs.

This Policy shall not, however, be used to raise malicious complaints. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action which may include demotion, suspension or termination will be taken against the person raising the complaint.

Any person who violates the confidentiality obligations under this Policy shall be subject to a statutory penalty of ₹5,000 in accordance with Section 17 of the POSH Act, in addition to disciplinary action under service rules.

The Chairperson will share the details of all complaints received and redressed with the CEO on a quarterly basis.

As per the "Provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal Act, 2013), "the employer shall include in its report the number of cases filed, if any, and their disposal under this act in the annual report of the Company or where no such report is required to be prepared, inform such number of cases, if any, to the district office.

Parallel Civil or Criminal Proceedings: Initiating parallel civil or criminal proceedings by either party shall not stay or stall the internal enquiry proceedings conducted by the Committee under this Policy.

8. Sexual Harassment and Client/Partners

The Company encourages its clients/partners to have a commitment to a sexual harassment free working atmosphere within their companies. The Company may play a facilitating role in redressal of complaints of sexual harassment in such circumstances. Where a complaint involves an external respondent (such as a client, vendor, or contractor employee), the Company follows a structured two-stage framework:

- Stage 1 (Preliminary Fact-Finding): The Committee shall conduct a preliminary investigation using its statutory powers to establish facts.
- Stage 2 (Disciplinary Transmission): Upon finding substance in the allegations, the Committee shall transmit its investigation report within 10 days to the respondent's primary employer for enforcement of disciplinary action under their service rules.

9. Policy Implementation and Review

The Policy will be implemented and reviewed by the HR Department. The Company reserves the right to amend, abrogate, modify, rescind /reinstate the entire Policy or any part of it at any time.

10. ANNEXURES

10.1. ANNEXURE I - Responsibility of Employees

The below is only an indicative list of basic Do's and Don'ts and is in no way intended to be construed as an exhaustive list.

Do's

- Know Knack System's Sexual Harassment Policy
- Be aware of inappropriate behaviours' and avoid the same
- Say "NO" if asked to go to places, do things or participate in situations that make you uncomfortable
- Trust your instincts. Walk away from uncomfortable situations.
- Say "NO" to offensive behaviour as soon as it occurs
- Refrain from taking discriminatory actions or decision which are contrary to the spirit of this Policy
- Maintain confidentiality regarding any respect of an inquiry to which they may be party to
- Inform immediately to the committee on occurrence of the incident

Don'ts

Verbal Harassment:

- Sexually suggestive comments or comments on physical attributes
- Offensive language that insults or demeans a colleague, using terms of endearment
- Singing or humming vulgar songs
- Requests for sexual favours, sexual advances, coerced acts of a sexual nature

- Requests for dates or repeated pressure for social contact
- Discussing sexual activities, sexual prowess or intruding on the privacy of an employee
- Sexually coloured propositions, insults or threats
- Graffiti in the office premises

Nonverbal Harassment:

- Offensive gestures, staring, leering or whistling with the intention to discomfort another
- Even if not directly done to a particular individual, uttering a word, making a gesture or exhibiting any object with the intention that such word, gesture, or object be heard or seen by employees
- Sounds, gestures, display of offensive books, pictures, cartoons, magazines, calendars or derogatory written materials at one's workplace
- Showing or mailing pornographic posters, internet sites, cartoons, drawings
- Suggestive letters, phone calls, SMS, electronic instant messaging or e-mail messages.

Physical Harassment:

- Physical contact or advances
- Intentional touching of the body, e.g. Hugs, kisses, brushing, fondling, pinching etc., that make others uncomfortable.
- Any displays of affection that make others uncomfortable or are inappropriate at the workplace.

10.2. ANNEXURE II - Guidelines for Redressal Committee

Role of the Committee:

- Review the complainant's complaint in a fair and objective manner
- Help the complainant and the accused find a way of solving the problem
- Determine the facts of the case with the individuals concerned and the witnesses, if any, and prepare a report with the findings
- Be bound in the principle of natural justice and be unbiased in their evaluation.

Conciliation:

- The committee before initiating an inquiry, at the request of the complainant should take steps to settle the matter between the complainant and the accused through conciliation provided that no monetary settlement shall be made as a basis of conciliation
- Where a settlement has been arrived the committee shall record the settlement so arrived and forward the same to the Head HR to take action as specified in the recommendation
- The committee shall provide the copies of the settlement as recorded to the complainant and the accused
- Where a settlement is arrived no further inquiry shall be conducted by the committee

Procedure for dealing with complaints: refer to respective clause on process of enquiry as stated above.

General Instructions:

- Any information relating to conciliation and inquiry proceedings, recommendations of the committee and the action taken shall not be published, communicated or made known to the public, press/media in any manner.
- Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken, contravenes, he/she shall be liable for action as per Company's disciplinary Policy

10.3. ANNEXURE III - Format for Recording/Enquiry

Details about employee whom the Complaint is received	
Employee No	
Employee Name	
Designation	
Department	
Complaint Reported By	
Employee No	
Employee Name	
Initial Reporting Date	
Reporting Medium (in person/mail/phone)	
Compliant Reported to	
Committee Member Employee No(s)	
Committee Member Name (s)	
Description of the Issue	
Team of Committee Members formed to Attend to this complaint	

Date of First Discussion with the complainant	
Details of the Discussion	
Details of Evidences gathered/analyzed	
Date of First Discussion with the Accused	
Details of the Discussion	
Details of Evidences gathered/analyzed	
Details of the Subsequent set of discussions with both the parties	
Final Action decided by Committee	
Date & mode of Communication of the action decided by Committee to both the parties	
Date of Final Action and Conclusion of the Compliant	

10.4. ANNEXURE IV - Committee Members

Emp. ID	Name	Designation	Effective From
	<u>Chairperson</u>		
0388	Dipty Bhurke	Director – Talent Acquisition	June 1, 2026
	<u>Members:</u>		
0445	Nikhil Joshi	Director - Program and Project Management	June 1, 2026
0757	Bhargavi Achanta	Managing Consultant - Practice Management	June 1, 2026
0208	Bharath Yelugula	Director - Practice Management	Nov 1, 2024
0427	Rakshith Madhav Shetty	Associate Director - Practice Management	Sep 1, 2026
	<u>External Member</u>		
	Dr. Sandya Advani	Founder	June 1, 2026