

## Prevention of Sexual Harassment at Workplace Policy

### 1. Objective & Commitment

G Square is committed to creating and maintaining a safe, respectful, and harassment-free work environment for all women employees as per the provisions of *The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* (“POSH Act”) and POSH Rules, 2013.

We maintain a zero-tolerance policy against sexual harassment and shall investigate all complaints promptly and confidentially, ensuring protection of the complainant against retaliation.

### 2. Scope

This policy applies to all women employees at G Square, including but not limited to full-time, part-time, probationers, trainees, interns, consultants, and any woman engaged through third-party vendors. It also covers remote or virtual workspaces that fall under the purview of G Square’s operational environment.

As per the **POSH Act, 2013**, the protection against sexual harassment at the workplace is extended specifically to women. However, at **G Square**, we are committed to upholding a workplace that is **safe, respectful, and inclusive for all genders**.

Recognizing that instances of sexual misconduct or false complaints can affect individuals of any gender, the organization promotes a **gender-neutral approach** in its internal grievance redressal mechanisms. While complaints made by male or transgender employees may not fall under the legal jurisdiction of the POSH Act, G Square will address such concerns under the company’s **Code of Conduct** or **Dignity at Workplace Policy**, ensuring fair investigation and appropriate action.

This inclusive practice aims to foster trust, reduce misuse, and maintain a healthy work culture grounded in equality, empathy, and zero tolerance for harassment of any kind.

### 3. Constitution of the Internal Complaints Committee (ICC)

As per Section 4 of the POSH Act, 2013, G Square has constituted an Internal Complaints Committee (ICC) at each workplace to address complaints of sexual harassment.

The first ICC was constituted on **June 1, 2022**, for a tenure of **three (3) years**, as mandated by the Act. The current term officially concludes on **May 31, 2025**.

In accordance with the law, the ICC **reconstituted in June 2025**. G Square reserved the right to **renominate existing members** or appoint new members, based on organizational requirements and individual eligibility.

Where existing members are reappointed (Mr. Sundaraman, Mr. Solaiyappan & Ms. Divyanshi Sethu), it will be considered a **fresh term &** Ms. Uma & Ms. Kalaiyarasi has appointed as new from Jun 2025, and their tenure will continue for a further period not exceeding **three (3) years**, as per the provisions of the POSH Act.

**Date of Constitution:** 01/06/2025

**Tenure:** 3 years

#### Members of the ICC:

Name	Designation	Role	Background
Ms Uma Maheswari	AVP-Digital Marketing	Presiding Officer	Senior Woman Employee
Mr. Sundaraman	Sr. Vice President	Member	Experienced in Leadership
Mr. Solaiyappan	Vice President	Member	Experienced in Leadership
Ms. Kalaiyarasi Elango	Manager - HR	Certified POSH Member	Committed to women's issues in G Square
Ms. Divyanshi Sethu	Certified POSH Trainer (External)	External Member	Certified Trainer & Coach

## 4. Complaint Mechanism

### A. Lodging a Complaint:

- Complaints must be made **in writing within 3 months** of the incident.
- The ICC may extend this limit by another **3 months**, if justified in writing.
- Complaints can be made:
  - Directly by the aggrieved woman
  - By relatives, friends, co-workers, or NGO officers with her **written consent**, in cases of incapacity
- The ICC will provide full confidentiality and support throughout the process.

### B. Conciliation:

- Before initiating an inquiry, at the complainant's request, the ICC may attempt **conciliation**, excluding any monetary settlement.

### C. Inquiry:

- The ICC shall complete the inquiry **within 90 days**.
- Parties will be given a fair opportunity to be heard.
- The ICC shall submit its **report to the employer within 10 days** of completion.
- Employer to act on ICC's recommendation **within 60 days**.

## 5. Penalties

### A. If Complaint is Proven:

The employer may act on ICC's recommendations including:

- Written warning
- Suspension or termination
- Referral to police for criminal proceedings (if applicable)

### B. If Complaint is False:

If the complaint is found to be **malicious or false**, ICC may recommend action against the complainant as per service rules.

## 6. Awareness, Training & Governance

As per Section 19 of the POSH Act:

- G Square will conduct **POSH awareness and orientation programs for all employees** periodically.
- **ICC members** will undergo regular **training** on handling complaints and legal procedures.

**Training records will be maintained** for audit and legal compliance.

## 7. Display of Policy and Penal Consequences

As per Section 19(b) of the POSH Act:

- This policy, contact details of the ICC, and the **penal consequences of sexual harassment** shall be displayed at **conspicuous places** in all office locations.

## 8. SHE-Box & Legal Access

Employees are informed of the **SHE-Box portal (<https://shebox.nic.in>)** which enables women to directly file complaints with the Ministry of Women & Child Development.

**G Square is registered on the SHE-Box portal as required.**

## 9. Reporting & Disclosure

- An **Annual Report** under Section 21 of the POSH Act and Rule 14 of the POSH Rules will be submitted to the **District Officer** every calendar year, containing:
  - Number of complaints received
  - Complaints disposed
  - Pending cases
  - Workshops conducted
  - Awareness sessions held
- As per the **Companies Act, 2013**, disclosures on POSH compliance will be included in the company's **Board's Report under Section 134**.

## **10. Website & Policy Publication**

In line with best practices and good governance, this POSH Policy is available on the **official company website**.

## **11. Confidentiality**

All complaints, statements, and evidence will be handled with **utmost confidentiality**. No information shall be shared externally or internally except as required by law.

## **12. Management Assurance**

- Sexual harassment is strictly prohibited and will be communicated across the organization.
- Complainants and witnesses will be **protected from victimization or retaliation**.
- Strict action will be taken against any violation of this policy.