

Prevention of Sexual Harassment (PoSH) Policy

In accordance with

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

Issued By

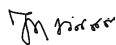
Holograph Technologies and Consulting India Pvt. Ltd.

Holograph-India Development Center:

Office No. 12, 1st Floor, 'A' Wing, City Vista DownTown,
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Title	PoSH Policy	Version	1.0
Prepared By	HR Team	Date	01-April-2026
Approved By		Doc	HR

Document Information

This Prevention of Sexual Harassment (PoSH) Policy is issued by Holograph Technologies and Consulting India Pvt. Ltd. in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and applicable rules framed thereunder.

This document serves as the official policy governing prevention, prohibition, and redressal of sexual harassment at the workplace and is applicable to all employees, trainees, interns, consultants, contractual staff, vendors, and any other persons covered under the scope of this policy.

The purpose of maintaining document control information is to ensure

- Proper version management of the policy
- Clear identification of the approving authority
- Timely review and updates in line with legal requirements
- Authenticity and official circulation of the policy document
- Internal compliance and audit readiness.

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PREVENTION OF SEXUAL HARASSMENT POLICY

Introduction: -

Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) is committed to provide a work environment free from harassment. Harassment can seriously impact the morale and productivity of the employees. It raises fundamental questions of safety when they are subjected to sexual harassment in the workplace. Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) observes zero tolerance for sexual harassment in any form and offenders shall be subject to stringent action as per this policy and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (“Act”).

Objective: -

This policy is formulated to achieve the below objectives

- To provide the guidelines for preventing inappropriate workplace behaviors of sexual harassment.
- To encourage employees to adhere to their responsibilities of preventing and reporting such inappropriate conduct before it becomes severe or pervasive.
- To provide a timely and fair mechanism for handling and resolving of any such complaints.
- To ensure that employees are trained to perform their roles in relation to this policy.

Scope and Applicability: -

This policy is applicable to every employee who is working as

- a. An Employee on Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) payroll.
- b. Contractors engaged through direct and indirect contract and working out of any of the Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) premises and/or at any such client sites within India.
- c. As trainee with or without remuneration, apprentice.
- d. Notwithstanding anything contained herein above, to all the employees as may be determined by Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) from time to time, at its sole discretion, without any gender differentiation.

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Explanation: - It shall also cover the visitors, clients, vendors and also the candidates who appear for interview.

The policy covers all allegations of sexual harassment irrespective of whether such an act is alleged to have taken place within or outside Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) premises, arising out of or during the course of employment, including official travel, conferences, training programs, work assignments outside Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) premises, transportation provided by Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”).

Note: - In case of any complaint against/by client or contract employees engaged through vendors, at least one of the parties to the complaint (either the Aggrieved Women or Respondent(s)) should be within the scope of applicability mentioned above.

Definitions: -

Aggrieved: - Any individual (of any gender) who alleges sexual harassment.

The Act recognizes the right of every Women to a safe and secure workplace environment irrespective of her age or employment/work status. Hence, the right of all Women working or visiting any workplace whether in the capacity of regular, temporary, adhoc, or daily wages basis is protected under the Act.

It includes all Women whether engaged directly or through an agent including a contractor, with or without the knowledge of the principal employer. They may be working for remuneration, on a voluntary basis or otherwise. Their terms of employment can be express or implied.

Further, she could be a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name. The Act also covers a Women, who is working in a dwelling place or house.

Respondent(s): - is a person against whom a complaint of alleging sexual harassment has been made under this policy.

Complainant(s)/Aggrieved Women: - Is a person who is authorized to make complaint in terms of this policy.

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WHAT IS A WORKPLACE?

A workplace is defined as “any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such a journey.”

As per this definition, a workplace covers both the organized and un-organized sectors.

It also includes all workplaces whether owned by Indian or foreign company having a place of work in India.

As per the Act, workplace includes

- Government organizations, including Government company, corporations and cooperative societies.
- Private sector organizations, venture, society, trust, NGO or service providers etc. providing services which are commercial, vocational, educational, sports, professional, entertainment, industrial, health related or financial activities, including production, supply, sale, distribution or service.
- Hospitals/Nursing Homes.
- Sports Institutes/Facilities.
- Places visited by the employee (including while on travel) including transportation provided by employer.
- A dwelling place or house.
- Virtual workplaces and all digital/online communication platforms including email, collaboration tools, video conferencing platforms, messaging applications, and social media interactions connected with work.

The Act defines the Unorganized Sector as

- Any enterprise owned by an individual or self-employed workers engaged in the production or sale of goods or providing services of any kind
- Any enterprise which employs less than Ten (10) workers.
- All Women working or visiting workplaces.

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Sexual Harassment: -

A. Sexual Harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely

- Physical contact or advances
- A Demand or request for sexual favors
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal contact of sexual nature

B. The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of Sexual Harassment may amount to Sexual Harassment

- Implied or explicit promise of preferential treatment in employment.
- Implied or explicit threat of detrimental treatment in employment.
- Implied or explicit threat about the present or future employment of the person.
- Interference with work or creating an intimidating or offensive or hostile work environment for the person.
- Humiliating treatment affecting any person's health or safety.

C. Sexually harassing or offensive conduct in the workplace, by or against the employees, whether committed by a supervisor, manager, peers or any other third party is strictly prohibited and unwarranted.

Complaint and Redressal Mechanism

Constitution of Prevention of Sexual Harassment Committee (POSH Committee) known as Internal Committee

Holograph Technologies and Consulting India Pvt. Ltd. ("Holograph-India"), has constituted a committee known as Prevention of Sexual Harassment Committee "Internal Committee" to consider and redress the complaints of sexual harassment. The Internal Committee consists of five members nominated by **Holograph Technologies and Consulting India Pvt. Ltd. ("Holograph-India")**, comprising of Presiding Officer who is a senior-level woman employee, and three other employees, and one external member from Non-Governmental organizations committed to the cause of Women or a person familiar with issues relating to sexual harassment. At least 50% of total members of POSH / Internal Committee are Women.

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The details of Internal Committee are as mentioned below.

Name	Designation	Mail ID	Internal / External
Pallavi Gawai	Sr. HR Executive	hr@holographttechnologies.com	Presiding officer
Pritee Sabne	Senior Atlassian Expert	pritee.sabne@holographttechnologies.com	IC member
Rahul Kathe	Deputy Manager - Accounts	accounts@holographttechnologies.com	IC member
Purnendu Chavan	Project Manager	purnendu.chavan@holographttechnologies.com	IC member
Aparna Gonate	External Person	aparna.gonate@gmail.com	External Member

Redressal Process

Logging Complaint: -

A complaint of sexual harassment at workplace shall be made in writing/email to the Internal Committee within **three months (90 Days)** from the **date of incident / last incident in case of series of incidents**. The Complainant(s)/Aggrieved Women shall submit **a written complaint** along with supporting documents, names and addresses of the witnesses. In case where such complaint cannot be made in writing, Internal Committee shall render all reasonable assistance to the Complainant(s)/Aggrieved Women for making the complaint in writing.

The Internal Committee can extend the time limit for filing the complaint for a period not exceeding three months in case it is satisfied that the circumstances were such which prevented the Complainant(s)/Aggrieved Women from filing a complaint within the initial three months.

All complaints shall be submitted via email to POSH@holographttechnologies.com, which shall serve as the designated channel for receipt and processing of complaints by the Internal Committee.

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Who can File a Complaint: -

Any Aggrieved Women person can file a complaint to the Internal Committee. However, in case the Aggrieved Women person is unable to make a complaint, the following person can make complaint on behalf of the Aggrieved Women

- In case of physical incapacity, any **relative or friend or co-worker or any officer of National / State Women's Commission or any person** with the knowledge of the incident subject to written **consent of the aggrieved person**.
- In case of mental incapacity, any relative or friend or special educator or qualified psychiatrist / psychologist or guardian or authority under whose care the Aggrieved Women is receiving treatment or any person with the knowledge of the incident jointly with any of the above.
- In case of death, her legal heir.
- For any other reason, any person with the knowledge of the incident subject to written consent of Aggrieved Women.

Conciliation Process: -

- The Internal Committee, may, before initiating an inquiry, at the request of the Complainant(s)/Aggrieved Women, take steps to settle the matter between the Complainant(s)/ Aggrieved Women and the Respondent(s) through conciliation. However, no monetary settlement shall be made as basis of conciliation.
- In case there is a settlement arrived at, the Internal Committee shall record the settlement so arrived and forward the same to the management to take action as specified in the recommendation. The copy of the settlement shall be provided by the Internal Committee to both Complainant(s)/ Aggrieved Women and the Respondent(s). There shall be no further inquiry into the complaint in such cases.

Inquiry into Complaint: -

The Internal Committee shall conduct the inquiry into the complaint made by the Complainant(s)/Aggrieved Women, if he/ she chooses formal investigation.

In the cases where a complaint is raised by a male employee, the same shall be reviewed and addressed separately by the Company Management / HR / Grievance Committee.

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The Internal Committee shall also conduct an inquiry in case the Complainant(s)/ Aggrieved Women informs that the settlement arrived at during conciliation above has not been complied with by the Respondent(s).

Based on the principles of natural justice, the Internal Committee conduct the inquiry in the following manner

- The Internal Committee shall send one copy of the complaint to the Respondent(s) within **Seven (7) days** of receipt of the complaint and the Respondent(s) shall file a reply to the complaint along with supporting documents within a period of **Ten (10) working days** from the date of receipt of the copy of complaint.
- Both the parties shall appear in person / virtually to present their case and cannot be represented by any third party. During the course of inquiry, the Internal Committee shall give an opportunity of being heard and a copy of the findings of the Internal Committee shall be provided to **both parties** enabling them to make a representation before the Internal Committee.
- For the purpose of making an inquiry, POSH Committee / Internal Committee shall have power to
 - i. Summon and enforce the attendance of any person and examine such person
 - ii. Require the discovery and production of documents and
 - iii. Any other matter which may be prescribed under law.
- **Ex parte Decision:** The Internal Committee shall have the right to terminate the inquiry proceedings or to give an ex parte order if the Complainant(s)/Aggrieved Women or Respondent(s) fails to be present, without sufficient cause, for three consecutive hearings convened by the Internal Committee. The Internal Committee shall give an advance notice of **fifteen days** in writing to the party concerned before passing such termination/ex parte order.
- The inquiry process shall be completed within the period of **ninety (90) days** from the **date of receipt of the complaint.**

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Interim Relief: -

In adherence to the PoSH Act, during the pendency of an inquiry, on a written request made by the Aggrieved Women, the Internal Committee, may recommend Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) to

- I. Depute the Aggrieved Women or the respondent(s) to any other workplace/ location, or
- II. Grant leave to the Aggrieved Women up to a period of three months in addition to the leaves the Aggrieved Women is entitled to, or
- III. Grant such other relief to the Aggrieved Women, as the Internal Committee deems fit.

On such recommendations, Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) shall implement the recommendations and confirm to the Internal Committee.

Report of Findings and Recommendations: -

- On completion of the inquiry, the Internal Committee will provide a report of its findings to Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) within a period of **Ten (10) days** from the completion of inquiry and such report must be available to the concerned parties.
- If the Internal Committee arrives at a conclusion that the allegation(s) against the Respondent(s) has not been proved, it shall recommend that no action is required to be taken. However, if the Internal Committee comes to the conclusion that the allegation(s) against the Respondent(s) has been proved, it shall recommend to take action in terms of the law and as per the policy of Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) against such Respondent(s) which may include
 - Verbal or Written warning or reprimand
 - Transfer or reassignment
 - Removal of management authority or duties
 - Suspension or termination
 - Withholding promotion or increment
 - Deduction of appropriate damages from the salary of the Respondent(s) to be paid to the Complainant(s)/Aggrieved Women
 - Training or counselling

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- The recommendations given by the Internal Committee shall be implemented by Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) within a period of **60 days** from the date of receiving such recommendations.

Sexual Harassment as Criminal Offence: -

If Aggrieved Women chooses to file a criminal complaint in relation to the offences of sexual harassment under the provision of the Indian Penal code, Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) shall provide all assistance to Aggrieved Women and Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) shall fully cooperate with the authorities in the investigation. In case the respondent(s) is not an employee or not in reach of Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”), Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”), at the request of Women, shall assist Women employee to lodge a police complaint.

Confidentiality: -

The proceedings under this policy, including the contents of complaint, identity, address of the Complainant(s)/Aggrieved Women, Respondent(s) and witnesses, recommendations of the Internal Committee and the action taken by Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) under this policy, shall always be kept confidential by Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) and the members of the Internal Committee.

Protection Against Retaliation: -

The Organization strictly prohibits retaliation against
Complainant(s)/Aggrieved Women
Respondent(s)
Witnesses
IC members

Retaliation includes

- Threats or intimidation
- Negative performance reviews without basis
- Exclusion or isolation
- Termination or demotion

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False or Malicious Complaint or False Evidence: -

If the Internal Committee reaches a conclusion that

- The Complainant(s)/Aggrieved Women has made a complaint against the Respondent(s), knowing it to be false, or
- If the Complainant(s)/Aggrieved Women or any other witness has provided any false or misleading evidence/document

The Internal Committee shall recommend Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) to take disciplinary action against such Complainant(s)/Aggrieved Women or witness as the case may be, which may include a written warning or reprimand, transfer or reassignment, removal of management authority or duties, suspension, termination of employment, withholding promotion or increment.

Appeals: -

Any person (complainant(s) /Aggrieved Women / respondent(s)) not satisfied by the recommendations of the committee may prefer an appeal in courts or as prescribed under “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013”. Such an appeal has to be filed within **Ninety (90) days** of recommendations of the Committee.

Discretion: -

- Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) at its option, may change, delete, suspend or discontinue parts of the policy in its entirety, at any time without prior notice.
- In case of inconsistency between the provisions of this policy and the Act or any other applicable law, the provisions of Act and such applicable law shall prevail.
- In the event of any dispute or ambiguity, interpretation of this policy shall be decided by Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”).
- Any act or conduct not covered under this policy shall be dealt under Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”)’s code of conduct policy or any other policy as applicable or as deemed fit and proper by Holograph Technologies

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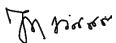


and Consulting India Pvt. Ltd. (“Holograph-India”) in accordance with the principles of natural justice and fairness.

Footnote: -

These guidelines are the property of **Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”)** reserves the right to unilaterally amend, change, modify, delete, replace or add to the statements in these guidelines, at any time, with or without prior notice.

Holograph Technologies and Consulting India Pvt. Ltd. (“Holograph-India”) reserves the right to interpret the provisions of these guidelines, and such interpretations will be final and binding. In addition, not every situation can be anticipated in written policies, guidelines and/or procedures, and the facts surrounding any situation can require discretionary judgments and any deviation in policy must be approved by the management.

Approved By: Kamalakannan Raj	Signature:- 
Place: Pune	Date Effective From: 01-April-2026

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Holograph PoSH Policy

Final Audit Report

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