

PURERIDE TECHNOLOGIES PRIVATE LIMITED
PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

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I. Scope:

Pureride Technologies Private Limited (hereinafter “Pureride”) Policy regarding **Prevention, Prohibition and Redressal of Sexual Harassment** covers every “employee” of the company (whether permanent, temporary, trainee, contractual, ad-hoc, part-time, etc.) during the course of employment for a harassment free workplace.

Pureride encourages every employee, who believes that such employee is sexually harassed, to use the redressal mechanism as provided in this policy.

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment, which may arise in places, not limited to geographical location i.e. company’s offices but also includes all such places or locations where work is undertaken whilst fulfilling professional duties. Pureride’s POSH Policy provides protection against sexual harassment at the workplace of employees and individuals including sexual harassment of or by fellow employees, supervisors, and managers and extends to individual’s like clients, vendors, partners and, visitors including outsourced employees whether the incident occurs during or beyond office hours.

This policy is applicable to Corporate Office as well as all branch/sales offices of Pureride on a Pan India level.

This Policy comes into force from the Effective Date.

II. Objective

The objective of this policy is to prohibit and provide redressal against sexual harassment to any employee, vendors, suppliers, consultants, trainees, visitors, students, community workers etc.

III. What Constitutes “SEXUAL HARASSMENT”

Any behavior (physical, verbal, written, graphic, emotional, psychological or through gestures that offend conveyed physically, electronically or in writing or any in any other form) which has been defined as inappropriate by the Policy, whether intentional or not, which offends the dignity of the person towards whom the behavior is directed by another fellow employee(s), supervisor(s), customer(s) or supplier/vendors(s) will be considered as sexual harassment and shall invite serious disciplinary/penal action.

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication or via digital/electronic platform) that may occur once or a series of occurrences such as:

1. Physical contact and advances; or
2. A demand or request for sexual favors; or
3. Making Sexually colored remarks; or
4. Showing or sharing electronically pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets, or sayings ; or
5. Advances involving verbal, non-verbal, or physical conduct such as lurid stares, physical

- contact or molestation, stalking, indecent exposure, physical contact, sounds, display of pictures, intrusive questions about a person's private life or body, signs, insults or taunts based on sex, obscene communication, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance; or
6. Eve teasing, innuendos and taunts, unwelcome invitations to go out, suggestive comments or jokes, physical confinement against one's will and likely to intrude upon one's privacy; or
 7. Any unwelcome gesture by an employee having sexual overtones (electronically or otherwise); or
 8. Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex; or
 9. Any unwelcome sexual activity tied to employment decision or benefits; or
 10. Any other unwelcome physical, verbal or non – verbal conduct of sexual nature or sending inappropriate conversations or messages at odd hours via email/mobile messages.

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

- I. Implied or explicit promise of preferential treatment in their employment
 - II. Implied or explicit threat of detrimental treatment in their employment
 - III. Implied or explicit threat about their present or future employment status
 - IV. Interfering with their work or creating an intimidating or offensive or hostile work environment;
 - V. Humiliating treatment likely to affect the health and safety of the aggrieved person
11. In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, would also be considered as sexual harassment.

Workplace means any place owned or controlled by Pureride or places visited by the employee or individual out of or during the course of employment and includes:

- Within the premises of the office/hub/workshops/parking areas
- Any place visited by the employee whether on roll or on contract, trainees, interns arising out of or during the course of the employment;
- Transportation provided by Pureride or during travel whether in the own vehicle or of others or hired, where such transportation is undertaken out of or during the course of employment and being accompanied by a fellow employee or any other individual acting on behalf or authorized by Pureride;
- Guest house/hotel where an employee whether on rolls or on contract, trainees and interns is staying while on duty or is visiting during the course of employment.

IV. Applicability:

- All employees of Pureride (including employees on contract, on 3rd (third) party rolls)
- All customers, suppliers, and contractors of Pureride.
- All third parties associated with Pureride at work or involved in work related activities.
- The complainant as well as the aggrieved individual may be a man or a woman
- The complainant as well as the aggrieved individual need not be of the opposite sex

- The respondent can be anyone including the complainant's supervisor/ an agent/contractor/customer/client /3rd (third) party associated with Pureride /or any other employee of Pureride.
- The complainant does not have to be the person harassed but could be anyone affected by the offensive conduct or the aggrieved individual him/her self.
- It may occur without economic injury to the complainant.
- It may occur at workplace or any other place where the employee is engaged in work related activities.
- It may occur with Pureride employees or persons acting on behalf of Pureride deputed to Pureride authorised sites.

V. Internal Complaints Committee:

The Internal Complaints Committee (ICC) is constituted to consider and redress complaints related to sexual harassment. The Constitution of ICC is as per the Act and includes external member from NGO or person familiar with the issues relating to sexual harassment. The quorum must include the President at least two members (one of whom must be female) and the external member. The member of the committee must include:

- A senior female employee from Pureride
- At least two members from amongst the employees who are committed to the cause of the women or the person familiar with issues relating to sexual harassment
- One-half of the total members must be women
- One women member from the NGO/Association who would be paid an honorarium to attend the enquiries of the Internal Complaints Committee

The Company has instituted an Internal Committee for redressal of sexual harassment complaint (made by the aggrieved individual or complainant) and for ensuring time bound redressal of such complaints.

The Internal Committee will comprise of the following members:

Name	Role
Varsha Basantani	President- ICC
Arti Chaudhry	External Member- ICC
Rahul Kumar	Member- ICC
Nancy Pahwa	Member- ICC
Sunder Singh	Member- ICC

♦ Each location/unit of Pureride Technologies Private Limited has a duly constituted Internal Complaints Committee (ICC), details of which can be obtained by any person by writing to any of the above-mentioned ICC member.

VI. Roles & Responsibilities

- **Responsibilities of Individual:** It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by: a. Refusing to participate in any activity which constitutes harassment b. Supporting the person to reject unwelcome behavior c. Acting as a witness if the person being harassed decides to lodge a complaint All are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behavior.
- **Responsibilities of Managers:** All managers at Pureride must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.
- **Responsibilities of Internal Committee:** The committee is responsible for:
 - Receiving complaints of sexual harassment at the workplace
 - Initiating and conducting inquiry
 - Recommending any interim relief
 - Submitting findings and recommendations of inquiries
 - Coordinating with the management in implementing appropriate action
 - Maintaining strict confidentiality
 - Submitting annual reports in the prescribed format
 - Discouraging and preventing employment-related sexual harassment

VII. Complaint Redressal Mechanism

The company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

Complaints:

The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the workplace. The complaint must be in writing (six copies) (email: posh@pureride.in)

The complaint must be lodged within **3 months** from the date of incident/ last incident. The Committee can extend the timeline by **another 3 months** (if it is satisfied with the reasons that prevented the lodging of the complaint).

Provided that where such a complaint cannot be made in writing by the complainant, the any Member of the Internal Committee shall render all reasonable assistance to the women for making the complaint in writing.

If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

1. If the aggrieved person is unable to make a complaint on account of their physical incapacity, a complaint may be filed by
 - a relative or friend; or
 - a co-worker; or
 - any person who has knowledge of the incident, with the written consent of the aggrieved person (hereinafter the “complainant”).
2. Where the aggrieved person is unable to make a complaint on account of their mental incapacity, a complaint may be filed by
 - a relative or friend; or
 - a special educator’ or
 - a qualified psychiatrist or psychologist; or
 - the guardian or authority under whose care they are receiving treatment or care; or
 - any person who has knowledge of the incident jointly with any of the above.
3. Where the aggrieved person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent.
4. Where the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

Redressal:

Internal Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment

- Once the complaint is received, before initiating the inquiry the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved individual.
- It is made clear to all parties that conciliation in itself doesn’t necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings are cleared.
- In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation will happen within **2 weeks** of receipt of complaint.
- The committee will provide copies of the settlement to complainant & respondent. Once the action is implemented, no further inquiry shall be conducted.

The Internal Committee may before initiating an inquiry, and at the aggrieved person’s request, attempt to settle the matter through conciliation. However, Internal Complaints Committee shall ensure that:

- Monetary settlement will not be made as a basis of conciliation.
- Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.
- Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the Internal Complaints Committee.

The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the Internal Complaints Committee through following mode:

- Copy of complaint along with supporting documents and names and address of witness (if any) shall be sent to any of the committee members on the above-mentioned email ID
- On receipt of such complaint, Internal Complaints Committee shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days
- Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses (if any)
- Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.
- During the enquiry process, the Complainant and the respondent shall refrain from any form of threat, intimidation or influencing of witnesses.
- The Committee will conduct enquiry in accordance with the principles of natural justice and will ensure to give both parties, the aggrieved as well as the respondent, a right to be heard and present their case before the Committee.
- The Committee shall ensure confidentiality during the enquiry process and will ensure that sufficient care is taken to avoid any retaliation against the witnesses.
- Internal Complaint Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause, provided that such termination or ex-parte Order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.
- The Internal Committee must complete its investigation within a period of 90 days.
- The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- For conducting the enquiry the quorum of the Internal Complaints Committee shall be of 3 members including the President.

The Internal Complaints Committee may during such investigation may exercise the power of a civil court, vested in it, in respect of:

- summoning and enforcing the attendance of any person and examining him under oath;
- requiring discovery and production of documents;
- any other prescribed matter.

During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend as interim relief:

- to transfer the aggrieved person or the respondent to any other workplace;
- grant leave to the aggrieved person of up to three months which is in addition to leave to which she is otherwise entitled. Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the workplace.

VIII. Action To Be Taken After Inquiry

- Post the inquiry the committee shall submit its report containing the findings and recommendations to the employer, within **10 days** of completion of the inquiry.
- The findings and recommendations would be reached from the facts established and are recorded accurately.

- If the situation so requires, or upon request of the complainant, respondent or witness, ICC may recommend interim measures such as transfer, changing of shift, grant of leave etc. to protect against victimization or distress during or subsequent to the course of inquiry, pending the final outcome.
- The committee within 10 (ten) days from the date of completion of inquiry shall provide a report of its findings and recommendation(s) to the Director and such report and recommendation(s) shall also be forthwith made available to the complainant(s) and respondent(s).
- Where the conduct of Sexual Harassment amounts to a specific offence under the Indian Penal Code, 1860 or under any other law; it shall be the duty of internal committee to immediately inform the complainant of his/her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and /or any action taken under this POSH Policy.

a. Complaint unsubstantiated

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter.

Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded.

b. Complaint substantiated

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the policies, and this may include:

1. Counseling
2. Censure or reprimand
3. Apology to be tendered by respondent
4. Written warning
5. Withholding promotion and/or increments
6. Suspension
7. Termination
8. Or any other action that the Management may deem fit.

The company will act upon the recommendations within **60 days** and confirm to the committee implementation of the actions, follow up with the complainant occurs to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring.

IX. Malicious Allegations

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the complainant.

The action recommended should be similar to the ones proposed for the respondent (mentioned in point VIII a. above) in case of substantiated complaints.

While deciding malicious intent, the committee will consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

X. Confidentiality

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the aggrieved individual's interest in keeping the matter confidential.

The identity of the complainant, respondent, witnesses, statements, and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media except where disclosure is required under disciplinary or other remedial processes.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

XI. Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within **90 days** of the recommendations being communicated.

XII. Limitations

- The Policy applies without limitation to all the employees of Pureride Technologies Private Limited and its subsidiaries ("Pureride ") or as a consultant. This Policy is also applicable to individuals working at all levels including without limitation directors, senior management, employees, third-party contractors, third-party consultants, interns, vendors or any other third-party potential clients, customers, distributors, agents, including their representatives, employees, advisors. Furthermore, this policy is applicable to Corporate Office as well as all branch/sales offices of Pureride and its group companies on a Pan India level.

- The subsidiary companies of Pureride are free to create a POSH Committee in line with the legislation to handle all complaints and grievances, provided that any subsidiary having ten or more than ten employees is mandatorily required to form their respective POSH Committee and shall duly comply with all the necessary filings before the concerned authority.
- The Pureride subsidiaries must inform their all the employees about the POSH Committee and provide information on its members to ensure a seamless process for resolving all complaints.

XIII. Awareness

All the Employees, Agents, Customers, Vendors and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the management.

The company shall comply with all other details as set out under Section 19(b) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “Act”) to ensure that all employees are provided with the safe working environment at the workplace.

Company shall display the notice showing the name of the Internal Committee members at its office(s) at a conspicuous place.

XIV. Miscellaneous

Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.

Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

XV. Conclusion

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media. The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Pureride to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available under applicable law.