



Policy Title	Prevention, Prohibition and Redressal of Sexual Harassment at workplace (referred to as PoSH)
Applicability	All employees on direct rolls of Hyperlink & its subsidiary companies + employees working with 3rd party rolls
Policy issued by	HR Department
Policy effective date	2nd February 2021
Policy revision date	12th May 2026
Policy Version	HR/Policies/POSH/1.9

I. OBJECTIVE & SCOPE

We are committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias, exploitation and intimidation caused by acts of Sexual Harassment. Hyperlink firmly believes that sexual harassment at workplace or arising out of employment is a very serious offence and is against the company's code of conduct.

The Company also believes that all employees of the Company have the right to be treated with dignity. The Company is dedicated to providing its employees with a safe and supportive workplace that values diversity and respects the contributions of people of all genders and sexual orientations. **This Policy extends to all employees* (as per Section III of this policy) of every gender associated with the Company.**

This Policy is also in compliance & governance with the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and in case of discrepancy between the said Act and this Policy, the said Act will prevail.

II. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment includes any one or more of the following unwelcome acts (whether directly or by implication):

- Physical contact and advances
- A demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography or the likes
- Any other unwelcome physical, verbal or non verbal conduct of sexual nature.

If the act of sexual harassment is coupled with any one or more of the following, it will also 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 present or future employment status
- Interference with work or creating an intimidating or offensive or hostile work environment for the person



- Humiliating treatment likely to affect the health or safety of the person

III. APPLICABILITY

- This policy is applicable to all the employees at Hyperlink offices & at all branches irrespective of their gender, age, salary, designation and nature of employment.
- This policy also applies to Non-employed individuals at Hyperlink offices like visiting consultants/advisors, service providers, customers and suppliers & any visitor at Hyperlink premises.

IV. KEY DEFINITIONS

- “Aggrieved Person” means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- “Complainant” means an aggrieved person who has made a formal complaint against the act of sexual harassment.
- “Respondent” means a person against whom the aggrieved person has made a complaint.
- “Employee” means a person employed at Hyperlink’s workplace for any work on;
 - Full time or part time basis
 - Probationer, regular or temporary employment on company rolls or through a third part contractor or agency including those working on *ad hoc* or daily wages basis
 - Freelancers, Interns, Consultants or advisors engaged with the company directly or through a third part contractor or agency
 - Whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied.
- An alleged act of sexual harassment concerning the employees at the workplace fall under the purview of this Policy irrespective of whether it’s committed during or outside of office hours.
- “Workplace” means all the establishments of the company and any place visited by the employee including a house or domestic dwelling (in case of work from home situations) arising out of or during the course of employment including transportation provided by the company for undertaking such journey.
- *Sexual harassment is judged by the impact and experience encountered by the complainant and not the intent of the Respondent.*
- *Sexual harassment as addressed in this Policy need not necessarily be by a male to a female employee, it can be vice versa as well as between individuals of same gender.* The board of Directors of Hyperlink have passed a resolution whereby a Redressal Grievance Committee will handle complaints received pertaining to sexual harassment received from employees of all genders except women employees. Further, it’s resolved that the members of PoSH ICC are authorised to be the members of the Redressal Grievance Committee.

V. CONSTITUTION OF COMPLAINTS COMMITTEE



As per the provisions of the Sexual Harassment of Women at Workplace Act 2013, an Internal Complaints Committee (ICC) will be constituted to address complaints falling under the purview of POSH. The guidelines for forming the ICC are as follows:

- a) The ICC will be constituted at all the offices of Hyperlink.
- b) The members of the ICC will be nominated by the Company's Directors.
- c) The committee will comprise of at least 4 members & at least half of the total members will be women.
- d) Presiding officer (PO) of the ICC should be a woman employed in a senior level at the workplace.
- e) If a senior level employed woman is not available for the post of PO in a particular workplace such a woman from another office/ branch of the same Company can be appointed.
- f) At least two persons from among the employees who have the knowledge of law, social work or concern for women shall be nominated as members of the committee.
- g) One member from a nongovernmental organization committed to the cause of women or person familiar with the issues of women at workplace shall be nominated as member of the committee.
- h) The PO and members shall hold office up to three years from the date of nomination.
- i) If any member of the ICC abuses the position, violates the confidentiality, has been convicted for an offence or has disciplinary proceedings against them, they will be removed from the panel and another member from the company will be nominated.
- j) The ICC, if so required on a case to case basis, shall form a local sub-committee in conformance with the provisions laid down The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 to investigate and present its report.

CONSTITUTION OF ICC (Minimum 4 members)	
Presiding Officer	1 woman employed at a Senior Level at the workplace
Members	2 employees who have the knowledge of law, social work or concern for women
External Member	From a nongovernmental organization committed to the cause of women or a person familiar with the issues of women at workplace

Refer to Annexure A to know the details of ICC of Hyperlink.

VI. COMPLAINT PROCEDURE & REDRESSAL

1. COMPLAINT:

- An aggrieved person can approach the ICC regarding the complaint.
- **The aggrieved person is to make the complaint in writing to ICC within three months from the date of incident & in case of a series of incidents, within a period of three months from the date of last incident of harassment describing therein the incident of sexual harassment including the details of the person/s allegedly causing the**



harassment, the date/s, location/s, witnesses, if any, or any other information that might be relevant.

- All written complaints must be emailed to the id posh@hyperlink.co.in. The complaint must be sent via the aggrieved person's hyperlink email id. If the complaint is sent via any other email id or submitted in handwritten or in print form then the same must be duly signed by the complainant & then e mailed to the above email id.
- The complainant also has the option to register the complaint on the SHe-Box portal' (<https://shebox.wcd.gov.in/>), launched by the Ministry of Women & Child Development. This initiative by the Government of India provides a single-access window for all women to raise PoSH related complaints. The registered complaint gets forwarded to the organization's nodal officer designated by the employer.
- If the aggrieved person requests for it then the PO/ICC member shall render necessary assistance in making a written complaint.
- If an aggrieved woman is unable to make a complaint due to the unfortunate event of death, their legal heir may make the complaint with the written consent of the aggrieved person.

2. ICC RESPONSE:

- On receipt of such complaint, the ICC shall provide a copy along with supporting documents of such complaint to the Respondent within 7 working days.
- The Respondent shall file a reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses.

3. ENQUIRY

- For conducting the enquiry the quorum of the ICC shall be of minimum 4 members including the presiding officer & external member.
- The ICC shall investigate in detail into the matter of the complaint. The ICC shall have the right to call the person against whom the complaint is made or any other witnesses when necessary.
- The ICC will complete its investigation within a period 90 days.
- Where the respondent is an employee the committee shall inquire into the complaint in accordance with the provisions of service rules.
- Any employee who comes across any information of any complaint or enquiry must treat such information as confidential and should not disclose such information to anyone, failing which the said act will be deemed as misconduct and necessary action will be taken.
- All colleagues and witnesses who are part of the Committee proceedings will need to sign a confidentiality agreement.
- 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 ICC.
- If the complainant or the person against whom the complaint is made desires any witness/es to be called, he / she shall communicate in writing to the ICC the names of witness/es that he / she proposes to call.
- If the complainant or the person against whom the complaint is made desires to render any documents by way of evidence before the ICC they shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be the original copies.



- The ICC shall have the right to terminate the enquiry proceedings or to give ex-parte decision on the complaint, if the complainant or the person against whom the complaint is made fails, without sufficient cause, to present himself or herself for three (3) consecutive hearings convened by the Presiding officer. Provided that such terminations or ex-parte order may not be passed without giving a notice in writing, fifteen (15) days in advance to the party concerned.
- The ICC may during such investigation may exercise the power of a civil court, vested in it, in respect of:
 - a. summoning and enforcing the attendance of any person and examining under oath;
 - b. requiring discovery and production of documents;
 - c. any other prescribed matter.

4. CONFIDENTIALITY

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the Internal Committee, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

The sharing of the content of the complaints will be on a “need to know” basis only. It is understood that sexual harassment is an issue of highly sensitive nature and therefore strict confidentiality will be maintained by the affected person/victim, defendant, witnesses, the Internal Committee and the Management Team.

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

5. CONCILIATION & SETTLEMENT:

- The committee at the request of aggrieved person before initiating the enquiry may offer the option to resolve the complaint through conciliation between the complainant and the respondent. The respondent's apology, the respondent's agreement to participate in gender sensitization and related training, or any other agreed upon settlement by the aggrieved person could be considered a settlement. However, the ICC shall ensure that:
 - a. There shall not be any monetary compensation as a basis for conciliation.
 - b. Where a settlement has been arrived, the settlement terms shall be signed by both the parties
 - c. The committee shall provide copy of the settlement to aggrieved person and the respondent and forward a copy of it to the Company for its implementation.
- Further enquiry by the committee is not required if a settlement is arrived and implemented.
- Where the aggrieved person informs the committee that any terms of settlement have not been fulfilled by the respondent, the committee shall initiate the enquiry.

6. INTERIM RELIEF DURING ENQUIRY

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

- a. to transfer the aggrieved person or the respondent to any other workplace;



- b. grant leave to the aggrieved person of up to three months which is in addition to leave to which the person is otherwise entitled.
- c. provide any relief to the aggrieved person as may be prescribed by the government.

VII. ACTION AFTER COMPLETION OF THE ENQUIRY

- On completion of the enquiry the committee shall submit the report of findings to the Company's Managing Director within 10 days and copies of the report shall be provided to the aggrieved person and the respondent.
- Where the committee comes to the conclusion that the allegation of sexual harassment is not proved, it shall recommend to the Company not to take any action against the respondent.
- If the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend one or more of the following:
 - a. Take action for sexual harassment as a misconduct.
 - b. To tender written apology to the complainant by the respondent, issue warning, withholding of promotions / increments of the Respondent, and/or terminating the Respondent.
 - c. To deduct from salary / wages of the respondent; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
- The committee may direct for the payment of monetary compensation to aggrieved person or her legal heirs, by deducting from the salary of the respondent. (In determining the amount of compensation the committee shall have regard to the pain or distress suffered by the aggrieved person, the loss in the career opportunity, the money spent for availing medical treatment if any, the financial status of the respondent, and the feasibility of such payment in lump sum or in instalment).
- If the Company is not able to deduct from the salary of the respondent due to absence from duty or cessation of employment, the committee may direct the respondent to pay the compensation to the aggrieved person or to the legal heirs.
- In case the respondent fails to pay the compensation determined by the committee, it shall send a recovery order to the district officer, to collect the amount as land revenue from the respondent and pay to the aggrieved woman.
- Where sexual harassment occurs by any third party or outsider, the Company shall take all steps necessary and reasonable steps to assist the affected person in terms of support and preventive action depending upon the facts of each case.
- The Company shall take action on the report of findings of the committee within sixty days from the date of its receipt.

VIII. ACTION AGAINST FALSE COMPLAINTS

Every complaint of sexual harassment shall be treated with utmost seriousness by the Company. However, in the event that the ICC comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the ICC may recommend action to be taken against the person who has made the complaint, including termination of service.



In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the ICC concludes, that he/she has given false evidence or produced forged or misleading documents.

IX. COMPLIANCE

- The ICC shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual return:
 - a. Number of complaints of sexual harassment received during the year;
 - b. Number of complaints disposed off during the year;
 - c. Number of cases pending for more than 90 days;
 - d. Number of workshops or awareness program against sexual harassment carried out;
 - e. Nature of action taken by the Company.

- Any other rules and procedures shall be in accordance with the 'Sexual Harassment of Women at Workplace (Prevention, Prohibition And Redressal) Act 2013' and its subsequent amendments.

X. RETALIATION

The affected person/victim lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of Sexual Harassment, the Internal Committee shall ensure that the affected person/victim or the witness are not victimized or discriminated against by the perpetrator. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the affected person/victim while the investigation is in progress should be reported by the affected person/victim to the Internal Committee as soon as possible. Disciplinary action will be recommended by the Internal Committee to the Employer against any such complaints.

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, within 90 days of the recommendations being communicated.



Annexure A

Members of Internal Complaints Committee (ICC)

The following ICC is appointed for all offices of Hyperlink:

Mumbai office:

S.No.	Role in ICC	Name	Designation
1	Presiding Officer	Ms. Komal Verma	Sr. VP-Talent & Culture
2	Internal Member	Mr. Neale Murray	Executive Director
3	Internal Member	Ms. Coralisa Pereira	AVP-BD & CS
4	Internal Member	Ms. Snehal Ambre	Creative Director
5	Internal Member	Ms. Pratiksha Vaidya	Executive Vice President-BD & CS
6	Internal Member	Ms. Kritika Kunden	General Manager - Sales & Marketing
7	Internal Member	Ms. Liane Dsouza	Manager - HR
8	Internal Member	Mr. Dudley Drego	President-MICE
9	Internal Member	Mr. Anupraj Kotekar	Director - Business Growth & Strategic Advisor
10	External Member	Dr. Medha Shetye	Consultant

Gurgaon Office:

S.No.	Role in ICC	Name	Designation
1	Presiding Officer	Ms. Komal Verma	Sr. VP-Talent & Culture
2	Internal Member	Mr. Neale Murray	Executive Director
3	Internal Member	Ms. Manisha Murjani	Account Director - BD & CS
4	External Member	Dr. Medha Shetye	Consultant

Bangalore Office:

S.No.	Role in ICC	Name	Designation
1	Presiding Officer	Ms. Komal Verma	Sr. VP-Talent & Culture
2	Internal Member	Mr. Neale Murray	Executive Director
3	Internal Member	Ms. Divya Ananthan	Associate Account Manager - BD & CS
4	External Member	Dr. Medha Shetye	Consultant

Note : All complaints of POSH as per this policy are to be emailed to posh@hyperlink.co.in