

V. Policy for Prevention of Sexual Harassment (POSH)

Introduction

To create and maintain safe work environment, free from sexual harassment discrimination for all its employees. As per the guidelines of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013”

Scope

This policy applies to all categories of employees/ consultants of Motivation India, including permanent, trainees and employees on contract at workplace or at client sites or any other place that they are visiting for official work, or in any connection with office. Motivation India will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other project associates.

The workplace includes:

- All offices or other premises where the Motivation India's projects are conducted
- All Motivation India related activities performed at any other site away from Motivation India's premises.
- Any social, business or other functions where the conduct or comments may have an
- adverse impact on the Motivation India or Motivation India's relations
- Any other location where the presence is because of official work

1. Definition

- 1.1. Sexual harassment is unwanted sexual attention of a persistent or offensive nature made by a person who knows, or reasonably should know, that such attention is unwanted. Sexual harassment includes sexually oriented conduct that interferes with an employee's job performance and creates an intimidating, hostile, or offensive working environment. While sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include:
 - Promising, directly or indirectly, an employee a reward if the employee complies with a sexually oriented request.
 - Threatening, directly or indirectly, to retaliate against an employee if the employee refuses to comply with a sexually oriented request.
 - Denying, directly or indirectly, an employee an employment-related opportunity if the employee refuses to comply with a sexually oriented request.
 - Engaging in sexually suggestive physical contact or touching another employee in a way that is unwelcome.
 - Engaging in explicit language, gestures, or indecent exposure.

- Making sexual or romantic advances toward an employee and persisting despite the employee's rejection of the advances.
 - Deliberately creating an overall offensive environment, including use of vulgar language, displaying, storing, or transmitting sexually explicit photographs or other materials, and the telling of sexual stories
- 1.2. Sexual harassment can be physical and/or psychological in nature. An aggregation of a series of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing.
 - 1.3. Employees are prohibited from harassing other employees whether or not the incidents of harassment occur on Motivation India property and whether or not the incidents occur during working hours.
 - 1.4. Sexual harassment can involve males or females being harassed by members of either sex. Although sexual harassment typically involves a person in a greater position of authority as the harasser, individuals in positions of lesser or equal authority also can be found responsible for engaging in prohibited harassment.
 - 1.5. Consensual sexual or romantic relationships between employees are deemed unwise and are strongly discouraged if one employee has supervisory authority over the other employee.

2. Responsibilities

- 2.1. If employees believe that they have been subject to sexual harassment or any unwanted sexual attention by anyone (e.g., a coworker, superior or any other person), they should:
 - Make their unease and/or disapproval directly and immediately known to the alleged harasser.
 - Complete an Incident Report form; and
 - Report the incident immediately to immediate supervisor. If that individual is responsible for the harassment, report the conduct to the Chairman.
- 2.2. Employees should feel free to raise concerns and make reports without fear of reprimand. It is unlawful to retaliate against an employee for filing a complaint of sexual harassment or for cooperating in an investigation of a sexual harassment complaint. All incidents of sexual harassment or inappropriate sexual conduct must be reported regardless of their seriousness. Alleging harassment without following these procedures might be considered evidence of a malicious intent on the part of the complainant.

3. Complaint Mechanism

- 3.1. An appropriate complaint mechanism has been formed by Motivation India known as the “Internal Complaints Committee” for time-bound redressal of the complaint made by the victim

4. Complaints Committee

- 4.1. The Internal Complaints Committee shall consist of the four members as mentioned below. The following members are to be nominated by the employer, namely: —
- Presiding Officer: - Senior Employee (Necessary to be a Women)
 - Member 1: - Employee (Necessary to be a Women)
 - Member 2: - Employee ((Not Necessary to be a Women)
 - Member 3: - External Legal Advisor (Not Necessary to be a Women)
- 4.2. Out of which at least two members will be of the same gender as that of the complainant:
- 4.3. The Internal Complaints Committee is responsible for:
- Investigating every formal written complaint of sexual harassment
 - Taking appropriate remedial measure to respond to any substantiated allegations of sexual harassment
 - Discouraging and preventing employment-related sexual harassment
- 4.4. Current Committee members are in **Annexure 1 - Internal Complaints Committee - POSH**.
- 4.5. The tenure of the committee members shall be 3 years from the date of their nomination and the same can be extended for further periods.
- 4.6. The ICC shall meet once in a quarter. A quorum of 3 members is required to be present for all meetings of the ICC to take place. The quorum shall include the Presiding Officer and at least two women members.

5. Procedures for Resolution, Settlement or Prosecution of Acts of Sexual Harassment:

- 5.1. Any victim may make, in writing or email to POSH@motivationindia.org, a complaint of sexual harassment at workplace to the Internal Committee, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. However, the ICC may decide to extend this under special circumstances.

- 5.2. The Internal Committee before initiating an inquiry and at the request of the victim takes steps to settle the matter between him/her and the respondent through conciliation (no monetary settlement shall be made as a basis of conciliation).
- 5.3. When a settlement is arrived, the Internal Committee shall record the settlement and forward the same to the employer or to take action as specified in the recommendation.
- 5.4. The Internal Committee shall provide the copies of the settlement to the victim and the respondent.
- 5.5. When a settlement is arrived, no further inquiry shall be conducted by the Internal Committee.
- 5.6. If the victim informs the Internal Committee that any term or condition of the settlement arrived has not been obeyed by the respondent, the Internal Committee will proceed to make the inquiry into the complaint or the complaint will be forwarded to the police.
- 5.7. Both the parties shall be given the opportunity of being heard during the course of inquiry and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee. During inquiry, the Internal Committee will have the powers of a civil court when trying a suit during below mentioned procedures:
 - Summoning and enforcing the attendance of any person and examining him on oath;
 - Requiring the discovery and production of documents; and
 - Any other matter which may be prescribed
- 5.8. The Committee is required to complete the inquiry within a time period of 90 days. On completion of the inquiry, the report will be sent to the employer or the District Officer, as the case may be, they are mandated to take action on the report within 60 days.
- 5.9. If the respondent is convicted of the offence, then the court may order payment of sums as it may considered appropriate by the aggrieved woman by the respondent. Corrective action may also include any of the following:
 - Formal Apology
 - Counseling
 - Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - Change of work assignment / transfer for either the perpetrator or the victim
 - Suspension or termination of services of the employee found guilty of the offence
- 5.10. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

6. Confidentiality

- 6.1. The Organization should understand that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances. If there is a breach of confidentiality, a fine up to Rs 5000 will be charged.

7. Access

- 7.1. All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by Motivation India except where disclosure is required under disciplinary or other remedial processes.

8. Training

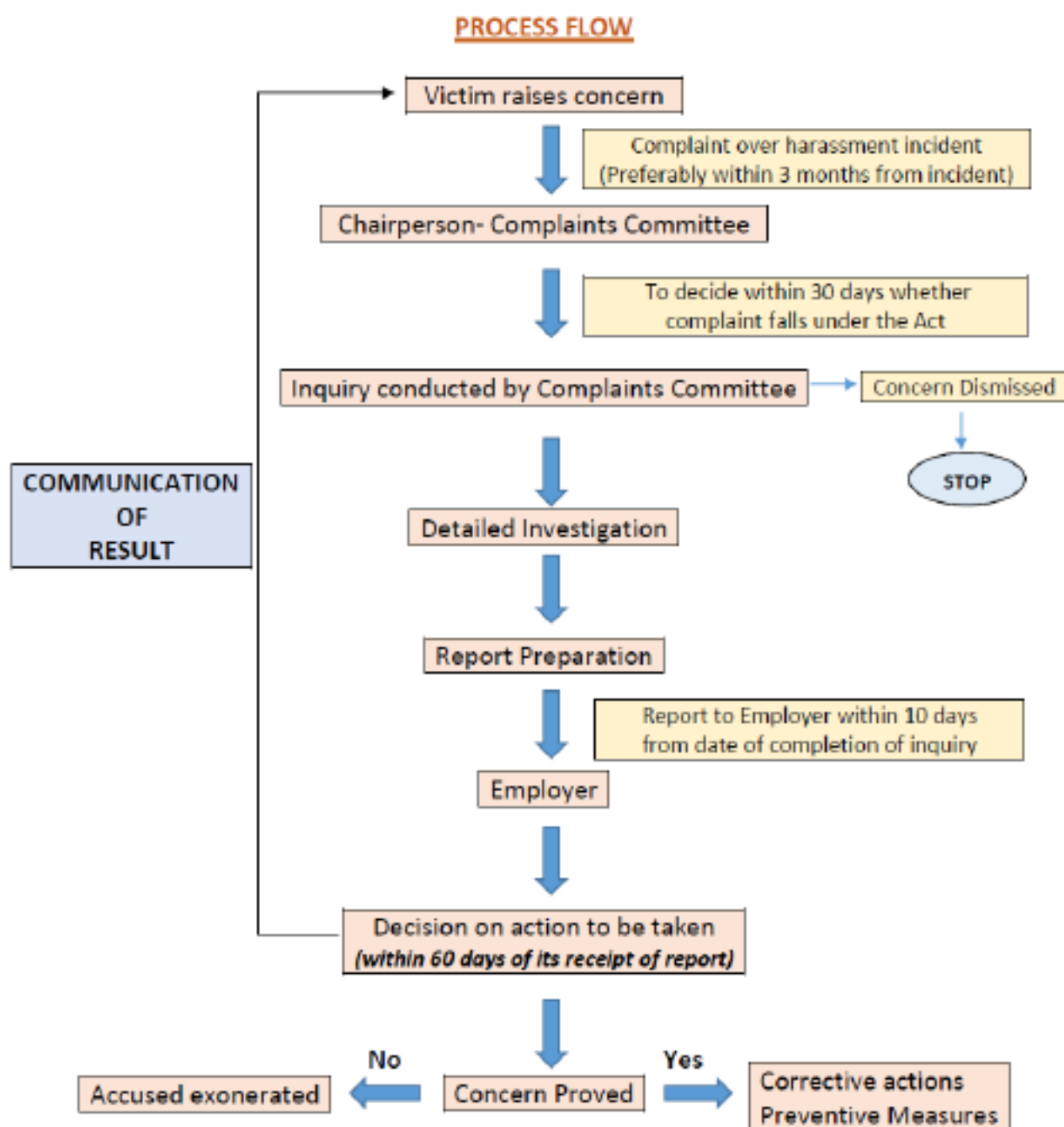
- 8.1. To Provide sensitization and awareness training to employees to educate them on the provisions of the POSH Act and the steps they can take to prevent and address incidents of sexual harassment.
- 8.2. We will display posters and notices in the workplace to raise awareness of the provisions of the POSH Act and the organization's anti-sexual harassment policy.

9. Annual return filing

- 9.1. Annual Report Filing: We will file an annual report including the number of complaints received, disposed and the steps taken to address them to the concerned District Women and Child Department.

Process flow of complaints below

10. Process Flow of complaints



Annexure 1 - Internal Complaints Committee - POSH

The members of the Internal Complaints Committee referenced in the Policy for Prevention of Sexual Harassment (POSH) Policy of Motivation India's Personnel Policies & Procedures (PPP) Manual for 2026-27 approved by the Board of Trustees on 26 June 2026 are:

- Presiding Officer: - Nandini Srinivasan, Programme Manager
- Member 1: - Sudhakar G, Head of Programmes
- Member 2: - Mahesh Chandrasekar, Director
- Member 3: - Sudha Reddy-External Member (External Legal Advisor)